

Digitising the control of fishery product imports

A panorama of the systems in place in the EU and ways forward

A report commissioned by ClientEarth to J.M Libioulle – consultant in fisheries and aquaculture

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Executive summary

The EU aims to prevent fishery products originating from IUU (illegal, unregulated, and unreported fishing) sources from entering the EU market. To achieve this, the IUU Regulation requires flag States that export seafood to the EU to certify the origin and legality of the fish with the use of a catch certificate. This catch certification scheme is one of the cornerstones of the IUU Regulation. Member States importing fishery products must validate the catch certificates that accompany imports and refuse importation when a catch certificate does not meet certain conditions.

To aid verification, some Member States have established IT tools allowing them to digitise and automate the process, thus making it more efficient than the original paper-based procedure. In this report, we describe IT tools established by six Member States. We compare the systems, perform a rough evaluation of the tools and recommend desirable features. The comparison shows the lack of level playing field within the EU.

Even with established IT tools, Member States are still verifying catch certificates separately. This prevents the detection of catch certificate overuse, i.e. the use of the same catch certificates to import different consignments through several entry points into the EU. This is a serious drawback of the national systems. So the European Commission (EC) has designed a central catch certification database and application - CATCH. An analysis of the gaps between the Spanish IT system and CATCH shows the imminent need for Member States to start using CATCH.

We summarise Member States' progress on catch certification and identify areas for development. We recommend highlighting the impacts of the implementation of the IUU regulation, by improving the EU CATCH system with an application monitoring trade flow variations. Finally, we make a series of recommendations to the European Commission (EC).

1 Introduction

The United Nations General Assembly specifically urged the international community to “effectively regulate harvesting and end overfishing, illegal, unreported and unregulated fishing and destructive fishing practices by 2020¹”. This is target 14.4 of Goal 14 – “Life Below Water” – part of the 2030 Sustainable Development Agenda adopted in 2015. The EU is committed to achieving a steady reduction in IUU fishing and ultimately eliminating the practice.

The IUU Regulation applies to all trade in marine fishery products originating from third-country fishing vessels and exported to the EU by any means of transport; and it applies to catches originating from EU fishing vessels to be exported to third countries². Through the IUU Regulation, the EU aims to prevent fisheries goods originating from IUU fishing from entering the EU market. To achieve this, the IUU Regulation requires flag States that export seafood to the EU to certify the origin and legality of the fish

¹ ‘Target 14.4: By 2020, effectively regulate harvesting and end overfishing, illegal, unreported and unregulated fishing and destructive fishing practices and implement science-based management plans, in order to restore fish stocks in the shortest time feasible, at least to levels that can produce maximum sustainable yield as determined by their biological characteristics’. More details on the website: <https://unstats.un.org/sdgs/metadata/?Text=&Goal=14&Target=14.4>.

² 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.

with the use of a catch certificate (CC). This is called the catch certification scheme and is one of the cornerstones of the IUU Regulation.

CCs are required as a precondition for the import of fishery products into the EU and for catches originating from EU fishing vessels to be exported to third countries. The CC documents the lawfulness of the products. The CC should be validated by the flag State of the fishing vessel that caught the fish; that State, in turn, should follow international rules on conservation and management of fisheries resources.

Based on this, Member States that import fishery products have to verify the validity of the CCs that accompany imports and refuse the importation when a CC does not meet the conditions listed in the IUU Regulation and specified in Annex II³.

As stated in Article 12(4), "*In agreement with flag States, within the framework of the cooperation set out in Article 20(4), 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 authorities*".

Therefore, partly to reduce the paper-based workload caused by the verification of the CC, and mainly to mitigate serious risks of overuse where multiple fish consignments attempt to use the same CC, thus exceeding the weight set out in the original document, some Member States have implemented centralised IT systems and are at different stages of their digitalisation process.

These IT tools currently have national coverage and are not able to detect fraudulent CCs or overuse in other Member States. To avoid this problem, a central EU database of CCs has been established. The EC has developed an IT tool to support the CC scheme. This IT system is called CATCH and aims to provide a single database for EU Member States, allowing real-time monitoring of import documentation controls. The first version of this system includes the CC, the processing statements (PS), and the importers' declarations. CATCH should help Member States to detect suspected fraud and abuse, simplifying and speeding-up controls at the EU border by reducing the administrative burden on import authorities. CATCH also ensures impartiality and reliability between Member States in their efforts to keep the EU market free of IUU fishery products, ensuring what is rejected at one entry point cannot enter the EU through another. In future versions CATCH will also support a harmonised EU risk analysis of the imports. Currently, each Member State has developed its own risk analysis which can be different from others'.

The purpose of this study is to analyse the different stages at which Member States are when it comes to digitalising their import control systems and compare these systems with the functionalities of CATCH.

In this report we aim to:

- Document the different stages Member States have reached in the process of CC digitalisation in the context of the revision of the EU fisheries control system.
- Encourage those who do not have an IT system to start using one and for those who have more thorough national systems to start using CATCH on a voluntary basis and provide feedback to the Commission on the possible needed improvements.

³ Annex II of 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.

- Draw attention to the lack of a level playing field within Europe when it comes to digitised import control systems, which remains a problem.

2 Methodology

2.1 Information available and questionnaires to Member States

Biennial reports

The primary sources of information regarding the implementation of the IUU Regulation are the biennial reports which Member States have to send every two years to the EC. This report is part of the obligations stated in Article 55 of the IUU Regulation. On the basis of the biennial reports submitted by the Member States and its own observations, the Commission must draw up a report every three years to be submitted to the European Parliament and to the Council.

The biennial reports used for this study are the reports for the years 2018 and 2019. When the required information was not available in the reports for 2018-2019, the reports for 2016 and 2017 were analysed.

The relevant section of the biennial reports is section 4, and more specifically question 4.11, which requires Member States to provider details on:

- Whether they have established any IT tools to monitor the CC and PS⁴ accompanying imports (yes or no) and,
- If it is the case, whether they include a module for re-exportation of imported catches.

As this information is not sufficiently detailed in the biennial reports, more information was needed and a survey was organised.

Survey of the IT systems used by Member States

Based on the information in the biennial reports and on the importance of their importations, a first group of Member States were selected to be surveyed. A basic questionnaire (in Annex 1) was sent on 26 November 26 2020 to 12 Member States: Belgium, Germany, Denmark, Greece, Finland, France, Ireland, Italy, Netherlands, Poland, Portugal and Sweden. A separate study on the Spanish system had already been carried out and the information gathered previously was used for this study for this Member State⁵. A simplified version of the questionnaire was sent at the beginning of 2021 to Member States that had not answered.

⁴ When the catch is processed, the CC is accompanied by a processing statement. The processing statement identify the part of the catch that has been processed to form the exported consignment and links this to the corresponding catch certificate. The template of the processing statement is detailed in annex IV of the IUU Regulation (EC) No 1005/2008 of 29 September 2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing).

⁵ In relation to the Spanish system, part of the information was retrieved from the following report on the Spanish system for the digitalisation of fish imports – SIGCPI: <https://www.clientearth.org/latest/documents/the-spanish-system-for-the-digitalisation-of-fish-imports-sigcpi/>

Some Member States preferred to answer the questionnaire by phone call. In the end, we received responses from Germany, Greece, France, Croatia, Hungary, Latvia, Sweden, Finland and the Netherlands. This was determined to be a sufficient representative sample to carry out the study.

In order to evaluate the level of digitalisation that Member States had reached, the questionnaire requested detailed information regarding key criteria for the control of CCs accompanying import notifications. The key criteria selected were:

Nature of CC management – manual or electronic	Is the verification of CCs done manually (paper documents) or automatically by an IT tool with digitised information? It can also be partly done by hand and partly by the IT tool.
Voluntary use of CATCH by the MS	Is the MS using CATCH already? The first version of the CATCH system was released in 2019 and might be used.
Use by the MS of an established IT tool	Has the MS established a specific IT application for the CC verification?
Existence of legal texts to back the use of a national IT tool	Is the digitised CC scheme backed by legislation or related implementing acts?
MS IT Tool Interoperability/linked with CATCH	Is the national IT application for CC verification interoperable with the EC CATCH system?
Existence of a warning from the system in case of overused commodities (at MS level)	One of the main features of the IT tool is the weight balance to spot overused CCs. Is the data automatically crosschecked and is there a warning in case overuse of a CC is detected?
Features that facilitate cooperation among competent authorities (better communication and sharing of information)	Is the IT tool used to communicate information between different entities (importer, fisheries authority, custom, food safety authorities...)?
Means of data entry by the operator (agent or importer)	How is the data entered into the system? The import notification can be sent to the MS authority in paper form or be scanned. Fully digitised IT tools are systems where the operator type the information directly in the IT application.
Level of integration of the IT tool in the MS's IT control system	The IT tool for CC verification can be part of a wider IT fisheries control system and retrieve information from other modules of the IT system.
Existence of a procedural manual	Are user manuals available? Are they public or restricted?
Dedicated staff trainings and guidelines	Have the MS staff received courses and manuals on how to use the IT tool?

MS IT tool allows access to third-country IT systems for verification CC	Can the IT tool to verify CCs be connected to non-EU IT systems (e.g. USA, Canada, Norway)?
Level of management of CCs and PSs by the IT tool	All CCs can be verified through the IT tool. Are there parts of the CC that are not verified or manually managed?
Existence of a risk-based approach	Are verifications of CC by the IT tool done according to risk criteria?
Nature of risk criteria taken into account	What are the risk criteria controlled by the IT tool for the CC verification?
Supervision procedures in place	How is the CC verification process supervised? Is there a quality control? Is there a review of record keeping?

2.2 Case study

In order to compare and contrast the different levels of digitalisation, the study has selected one Member State, Spain, to propose a more in-depth analysis of the features of its national system and compare them with CATCH. This analysis will present Spain's system, as well as the EU's CATCH system, and underline the gaps that exist.

2.3 Analysis of trade flows for holistic interpretation

One way to detect imports of IUU fishery products into Member States is to analyse the trade flows of fishery products between the third-countries and Member States and the re-exportation of imported fishery products⁶ between Member States.

3 Overview of the IT tools used by some Member States

Information given in biennial reports⁷ shows that 13 Member States out of a total of 26⁸ have created IT tools to monitor the CCs and PSs accompanying imports. This represents about half the Member States that were studied. Five of the 13 IT tools established include a module for re-exportation of imported catches (for the creation of re-export certificates⁹). If the Member State did not establish an IT tool, obviously there is no module for re-exportation of imported catches.

The results are summarised in the following table.

⁶ According to Art. 2.14 of the IUU Regulation, 're-exportation' means any movement from the territory of the Union of fishery products which had been previously imported into the territory of the Union.

⁷ Biennial reports 2018-2019 or in 2016-2017 biennial reports when no information was available in 2018-2019.

⁸ No information available for Luxembourg.

⁹ The form in Annex II of the IUU Regulation is made up of two parts: the catch certificate and the re-export certificate. The catch certificate is issued by flag States. The re-export certificate is used by Member States to verify if products which were imported into the EU and are due to be re-exported were accompanied with a catch certificate validated by the flag State.

Table 1. Replies to Biennial Reports - Has your country established any IT tools to monitor the catch certificates and processing? If yes, does it include a module for re-exportation of imported catches?

Member State	Information sources: Biennial report	IT system	Additional information	Module for re-exportation of imported catches
AU	2018-2019	YES	-	YES
BE	2018-2019	NO		
BG	2018-2019	NO	A register for catch certificates and processing statements has been established, which allows online monitoring at the three designated points: Bugras, Varna and Sofia.	
CY	2018-2019	NO		
CZ	2018-2019	YES	-	NO
DE	2018-2019	YES	An extension of the IT tool to include a function for recording re-exports was planned in 2018.	NO
DK	2018-2019	NO		
EE	2018-2019	YES	-	YES
EL	2018-2019	YES	-	N.A
ES	2018-2019	YES	-	NO
HR	2018-2019	YES	-	N.A
HU	2017-2018	NO		
IE	2018-2019	NO		
FI	2018-2019	YES	-	NO
FR	2018-2019	NO	No details available about the establishment of an IT tool. All the information ¹⁰ is hidden from the public	
LT	2018-2019	NO		
LV	2018-2019	YES	-	YES
MT	2018-2019	NO		
IT	2016-2017	YES	The check for the presence of CCs and PSs is done through the eligibility check carried out by the Customs Agency. Checks are also carried out "a posteriori", within three years, to review the customs declarations, to verify the correctness and completeness of all the particulars declared on the basis of the documentation submitted.	NO
NL	2018-2019	YES	-	YES
PL	2018-2019	NO		
PT	2018-2019	YES	The IUU officials (Unit/Division of Inspection and Control) register and file a copy of each import/re-export process in the document management system (SmartDocs), including catch certificates, industrial declarations, health certificates and transport documents. SmartDocs is an IT tool used for all types of internal tasks, so it is neither exclusive nor specific for IUU matters. For each process a	YES

¹⁰ In response to question 4.11 (Has your country established any IT tools to monitor the catch certificates and processing statements accompanying imports?) in the biennial report.

Member State	Information sources: Biennial report	IT system	Additional information	Module for re-exportation of imported catches
			huge Excel file dedicated to verification for legality of the import is simultaneously filled.	
RO	2018-2019	NO		
SE	2016-2017	YES	On the client side, a web application enables importers to register CC catch certificates and any relevant enclosed documents. On the server side, a database with a user interface enables authority administrators to verify and validate any documents provided.	NO
SI	2016-2017	NO		
SK	2016-2017	NO		

Based on the information gathered through the questionnaires and the desk research, a basic description of the IT tools in use can be given for Germany, Croatia, Finland, Latvia, the Netherlands and Sweden.

The key features of each IT system are described in each table and a typology of the different IT tools is then suggested.

3.1 IT systems available in Member States

Germany (DE) – FIKON II

The German IT tool is called FIKON II¹¹. This web-based system is used by the Federal Institute of Agriculture and Food (the BLE¹²).

The BLE is responsible for the control of the CC and the necessary accompanying documents for import and for the control of direct landings from third countries. In cooperation with customs, the BLE monitors the import of goods covered by the IUU regulation. Customs only approve the import of fishery products upon presentation of a valid BLE authorisation. A verification of the goods is then also carried out by the veterinary office.

FIKON II¹³ is divided into three sections:

- FIKON public: importer declarations
- FIKON internal: control area
- FIKON admin: registration and administration of users

¹¹ Website for FIKON II: <https://apps.ble.de/GAGA/applframe/index.jsf?login>

¹² The original name in German is: Bundesanstalt für Landwirtschaft und Ernährung

¹³ Part of the information on FIKON II is taken from the presentation “Germany and its catch certificate control system: benefits and challenges”. By Anna Kullmann, Federal Office for Agriculture and Food (BLE), at the webinar ‘Stopping IUU fish from entering the EU Towards an EU-wide database for fish imports’ organised by ClientEarth and the IUU Coalition the 24 September 2020 available at: <http://www.iuuwatch.eu/2020/09/event-stopping-iuu-fish-from-entering-the-eu/>

FIKON II conducts risk management for imports covered by the IUU Regulation. In simple terms, the system is based on categorisation of the CC information. The risk management system is structured along three risks levels corresponding to three levels of scrutiny. It is possible to assign a risk level to each declaration. Easy cases are decided by a single official, whereas complicated cases are generally discussed in the team and then decided jointly. In addition, notifications are sent to other Member States and the Commission in the event of serious abnormalities in the documents. The FIKON II electronic control system makes it possible to set risk management parameters that divide the declarations into different risk categories. The inspector can immediately determine whether an import is risky. In addition, crosschecks of the data are carried out via the system.

The risk-management system is based on Article 31 of the Commission Implementing Regulation to the IUU Regulation (Regulation (EC) No. 1010/2009) and the parameters evaluated are:

- Quantity management
- Flag States
- Species
- Catch Certificates
- Risk settings that are visible in the respective declaration.

And other parameters not provided for by the regulations:

- Trade flows
- Transhipments and processing
- Changes in markets
- Crosschecks.

The system filters the logins by risk. Only applications with a very low risk are controlled by the system, where crosschecks of the data, in particular the weight balance, are carried out. In the event of abnormalities, these logins must also be checked manually. In addition, the system applies a 5% randomness rate to "unproblematic" cases, automatically filtering that amount out for manual control.

A large part is also checked manually. Fresh goods in particular depend on speedy handling. All necessary administrative procedures are fed into the IT system in digital form (administrative decisions, refusals and withdrawals)¹⁴.

The data is entered by the importers or their agents.

¹⁴ Source: reply to the questionnaire sent to Germany SLO.

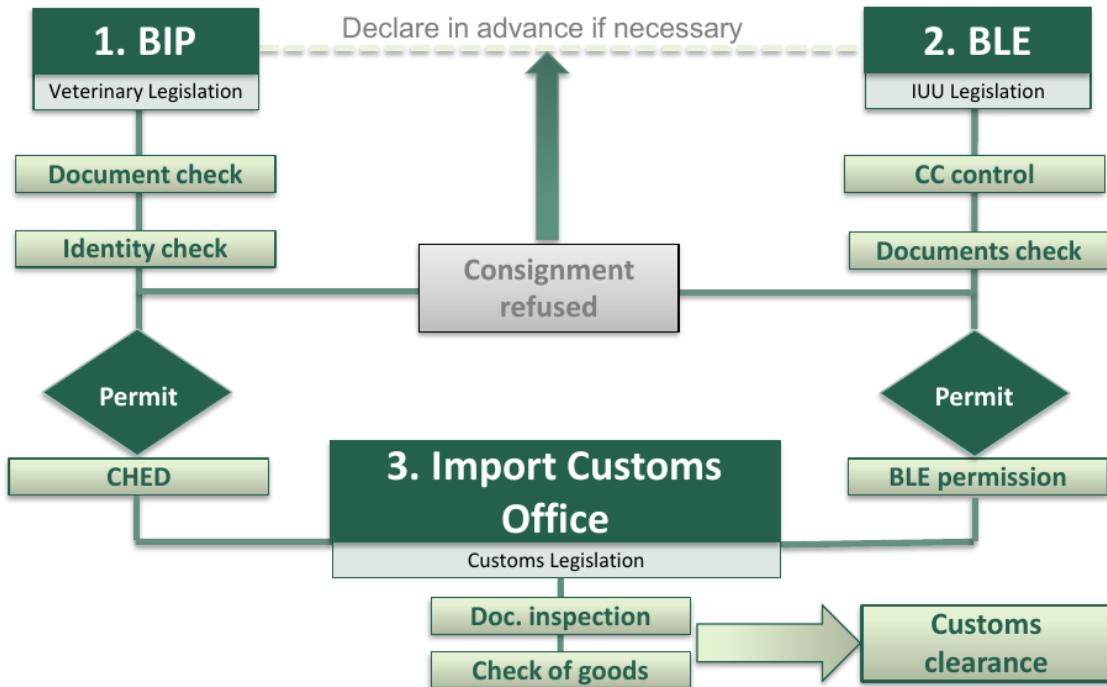


Figure 1. Import procedure in Germany (Source: Federal Office for Agriculture and Food (BLE)¹⁵)

In 2021, FIKON II will be integrated into the ATLAS¹⁶ system, the customs software of the German customs administration, and approvals will be transmitted to customs automatically. The two user manuals¹⁷ can be downloaded from the BLE website¹⁸. The legal basis for the use of FIKON II is also available online¹⁹.

Table 2. Germany's system evaluation table

Criteria and Key Elements – Germany	
Number of staff for CC verification	9
Procedures for verification of CC for importation	YES
CC management done manually	Partly (depending on the risk level)

¹⁵ Presentation given during the Webinar “Stopping IUU fish from entering the EU Towards an EU-wide database for fish imports’ organized by ClientEarth and the IUU Coalition the 24 September 2020 <https://www.clientearth.org/media/parnvthn/2020-09-24-germany-and-its-catch-certificate-control-system-fikon-ii-structure-features-and-risk-management-anna-kullman-ext-en.pdf>

¹⁶ ATLAS means Automated Tariff and Local Customs Clearance System

¹⁷ User manuals for FIKON II admin available at https://www.ble.de/SharedDocs/Downloads/DE/Fischerei/IUU-Fischerei/Handbuch_FIKON_II_Admin.pdf?blob=publicationFile&v=6 and also available for FIKON II registering at: https://www.ble.de/SharedDocs/Downloads/DE/Fischerei/IUU-Fischerei/Handbuch_FIKON_II_Registrierung.pdf?blob=publicationFile&v=6

¹⁸ https://www.ble.de/DE/Themen/Fischerei/IUU-Fischerei/Kontrolle-der-Fischeinfuhren/Fischeinfuhr_node.html

¹⁹ Law for the regulation of sea fishing and for the implementation of the fishing law of the European Union (Sea Fisheries Act - SeeFischG) § 10 Databases and validation system http://www.gesetze-im-internet.de/seefischg/_10.html

Criteria and Key Elements – Germany	
Use of the CATCH system by the MS	NO
IT tool established by the MS	YES
Legal basis for the use of national IT tools for CC verification	YES
MS IT Tool Interoperability/linked with CATCH	NO
Warning from the system in case of overused CCs (at MS level)	YES
Facilitate cooperation among competent authorities (better communication and sharing of information)	NO
Data input by the operator (agent or importer)	YES
Integration of the IT tool in the MS's IT control system	In progress
Procedure manual available	YES
Staff have received training and guidelines	YES
MS IT tool allows access to third-country IT systems for verification of CCs	NO
100% of CCs and PSs are managed by the IT tool	Almost 100% (automatically to manually according to risk criteria)
Risk-based approach	YES
Risk criteria taken into account	Built-in weight changes CC document number
Supervision procedures in place	Not communicated

Croatia (HR) - Automatic Comparison System

The control of CCs supporting importation notifications is carried out using an IT Tool (Automatic Comparison System or ACS) which is part of the fisheries control system²⁰. The regular control of CCs upon import is carried out by the customs administration, which uses the IT system to monitor consignments, based on which consignments can be further inspected using risk assessment.

The IT tool (ACS) has been established for crosschecks and for risk management. Customs officials get messages through the IT system warning them and reminding them of the important checks to be done. Customs officials at regional custom offices check all transport and commercial documents. Bills of lading, airway bills, CMRs²¹, packing lists, invoices, health certificates and other available documents are crosschecked with the information on the customs declaration for import (quantity, type and other) as well as with the information provided in the CC or with the PS. Documentary control is carried out for

²⁰ More information available on the system at <https://www.ribarstvo.hr/valid>

²¹ CMR meaning « Convention de transport de Marchandise par la Route » is the standard contract of carriage for goods being transported internationally by road.

each imported shipment without exception. Controls are done in the same way no matter how consignments enter the country. When the documents received by customs are paper documents, the custom official enters the information into the IT system.

The ACS is part of the Fisheries Control System web portal. The introduction of TRACES²² is underway within the customs service.

Table 3. Croatia's system evaluation table

Criteria and Key Elements – Croatia	
Number of staff for CC verification	14
Procedures for verification of CC for importation	YES
CC management done manually	YES
Use of the CATCH system by the MS	NO
IT tool established by the MS	YES
Legal basis for the use of national IT Tools for CC verification	Not communicated
MS IT Tool interoperability/linked with CATCH	NO
Warning from the system in case of overused CCs (at MS level)	YES
Facilitate cooperation among competent authorities (better communication and sharing of information)	NO
Data input by the operator (agent or importer)	NO (data input by custom)
Integration of the IT tool in the MS's IT control system	YES
Procedure manual available	YES
Staff have received training and guidelines	YES
The MS IT tool allows access to third-country IT systems for verification of CCs	NO
100% of the CC and PS are managed by the IT tool	YES
Risk-based approach	YES
Risk criteria taken into account	Criteria not communicated Crosschecks of all documents
Supervision procedures in place	Not communicated

²² TRACES Web portal: <https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Home.htm>

Finland (FI) – LIS

LIS²³ (Import applications for fish from third countries) is the Finnish IT tool established to manage the CC verification for imports. The information is entered by the operators (importers or agents) after logging in with a strong authentication.

The mandatory data fields are: importer, exporter, processing plant, processing country, CC number, flag State of the vessel, name of the vessel, species, quantity of fish and FAO area. In addition, scanned copies of CCs and PSs, bills of lading²⁴, health certificates and other documents must be attached to the application. The application also contains reporting tools for statistics and billing.

The competent authority is the Ministry of Agriculture and Forestry²⁵. The ETE-Centre is the Centre for Economic Development, Transport and the Environment for Southwest Finland Fisheries and it includes the unit in charge of IUU control. ETE-Centre inspects the CCs and PSs of fishery products imported to the European Union and is also responsible for the validation of the CCs of fishery product consignments exported from Finland to third countries. Two fisheries inspectors cover the tasks of verifying and validating CCs. Customs are involved in the process and permit consignments to enter the market.

LIS is the electronic service by which an importer of fishery products can submit the import application to ETE-Centre. The authority processes the application and the decision is made in the electronic system and then sent to the applicant and to Customs in electronic format for customs clearance. The veterinary authority also has access to the IT system.

LIS also includes a very useful risk-management system that make verifications easier and faster. It makes automatic crosschecks between used/suspended CC numbers, IUU vessels, non-notified countries, high-risk countries (e.g. yellow and green flag countries), fish species, exporters and importers.

It is still possible for the importer to send paper documents by email (scanned) or by post. The documents are then entered by the official into the IT system.

A procedural manual exists for users²⁶ and for registration²⁷ to LIS. A guidebook has been drafted for the ETE-Centre officials and two guidelines are available online in English for importers^{28,29}. However, no special courses have been organised for importers.

²³ The LIS web portal can be checked at <https://lis-hakemukset.mmm.fi/loginPage.jsp>

²⁴ The bill of lading is a required document to move a freight shipment. The bill of lading works as a receipt of freight services, a contract between a freight carrier and the shipper and a document of title.

²⁵ The Ministry of Agriculture and Forestry of Finland website can be checked at: <https://mmm.fi/en/iuu-fishing>

²⁶ More information can be found at: http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm , http://ec.europa.eu/food/audits_analysis/annual_reports/index_en.htm and http://ec.europa.eu/food/audits_analysis/audit_programmes/index_en.htm

²⁷ <https://mmm.fi/documents/1410837/1863968/Valtuusrekisteri+ja+LIS-asiointipalvelu+ohje/72f24f6e-ad19-ac00-4ef5-5e7518a1ea03/Valtuusrekisteri+ja+LIS-asiointipalvelu+ohje.pdf>

²⁸ Guidelines about the CC scheme for importers can be checked at: https://mmm.fi/documents/1410837/1801550/Saalistodistusj%C3%A4rjestelm%C3%A44_ohjeet_24.1.2018_EN.pdf/534a09cf-084f-40da-9696-e8e322d0150e/Saalistodistusj%C3%A4rjestelm%C3%A44_ohjeet_24.1.2018_EN.pdf

²⁹ Guidelines about the IT system for importers can be checked at: https://mmm.fi/documents/1410837/1801550/K%C3%A4ytt%C3%B6ohje_LIS_hakupalvelu_versio+EN+7.8.2018.pdf/bd8f6a4e-c5af-4a8b-958e-8c06249fff97/K%C3%A4ytt%C3%B6ohje_LIS_hakupalvelu_versio+EN+7.8.2018.pdf

Table 4. Finland's system evaluation table

Criteria and Key Elements - Finland	
Number of staff for CC verification	1.4 FTE ³⁰
Procedures for verification of CCs for importation	YES
CC management done manually	NO
Use of the CATCH system by the MS	NO
IT tool established by the MS	YES
Legal basis for the use of national IT Tools for CC verification	Not communicated
MS IT Tool Interoperability/linked with CATCH	NO
Warning from the system in case of overused CCs (at MS level)	Not communicated
Facilitate cooperation among competent authorities (better communication and sharing of information)	YES (CA with Custom and Veterinary office)
Data input by the operator (agent or importer)	YES
Integration of the IT tool in the MS's IT control system	Not communicated
Procedure manual available	YES (not public)
Staff have received training and guidelines	YES
MS IT tool allows access to third-country IT systems for verification of Catch certificates	NO
100% of CCs and PSs are managed by the IT tool.	YES
Risk-based approach	YES
Risk criteria taken into account	<ul style="list-style-type: none"> • automatic crosschecks between used/suspended CC numbers • IUU vessels • non-notified countries • high risk countries (e.g. yellow and green flag countries) • fish species • exporters and importers

³⁰ Full-time employee.

Criteria and Key Elements - Finland	
Supervision procedures in place	Not communicated

Latvia (LV) – LFICIS

In Latvia, the State Environmental Service (SES)³¹ together with its Fisheries Control Department is the authority responsible for the validation of the catch certificates issued by third-countries, to allow the import into or re-export of fishery product via Latvia³². The SES uses a national fisheries control system backed up by its national regulations to manage CC verification for imports³³.

The LFICIS (Latvian Fisheries Integrated Control and Information System) is available for a variety of users, including operators, customs, the Ministry of Agriculture and the Fisheries Department. It is an electronic system, where all fisheries management information is collected (including limits, catches, landings, first buyers, sale notes, transportation documents as well as validated catch certificates).

SES employees, under the supervision of two fisheries inspectors, scan the CCs and the documents accompanying the import notification to validate them. Scanned documents are entered into the LFICIS. Customs has access to LFICIS and checks documents validated by the SES. Original documents submitted by importers and validated CCs must be kept in paper form for three years and electronically in LFICIS on a permanent basis.

The CCs are verified by crosschecking the necessary information, including the IUU vessels list and the information in the EU mutual assistance system. Documents for all imports are checked according to the European Fisheries Control Agency (EFCA) and Commission guidelines. At present, LFICIS conducts verifications and crosschecks to ensure:

- the total amount indicated in the PS cannot exceed the amount in the CC;
- the quantity indicated in the invoice does not exceed the amount indicated in the CC;
- the total amount of indirect import does not exceed the amount in the CC.

The Latvian authorities have not created any manuals. The legal basis of the system is contained in the Rules of the Cabinets No 94 “Regulations Regarding the Control of Fish Landing and Inspection of Fish Marketing and Transport Facilities, Warehouses and Processing Premises”³⁴.

Staff have received internal training and can get assistance from the website. They also receive courses from EFCA. Guidelines have also been provided by EFCA and the EC.

³¹ The web site of the SES is

³² The Ministry of Agriculture/Fisheries Department is responsible for the validation of the CC for the Latvian vessels catches for export.

³³ See: <https://likumi.lv/ta/en/en/id/297288-regulations-regarding-the-control-of-fish-landing-and-inspection-of-fish-marketing-and-transport-facilities-warehouses-and-processing-premises>

³⁴ See: <https://likumi.lv/ta/en/en/id/297288-regulations-regarding-the-control-of-fish-landing-and-inspection-of-fish-marketing-and-transport-facilities-warehouses-and-processing-premises>

Table 5. Latvia's system evaluation table

Criteria and Key Elements - Latvia	
Number of staff for CC verification	9 (3 fisheries officials and 6 customs board officers)
Procedures for verification of CC for importation	YES
CC management done manually	NO
Use of the CATCH system by the MS	NO
IT tool established by the MS	YES
Legal basis for the use of national IT Tools for CC verification	YES
MS IT Tool Interoperability/linked with CATCH	NO
Warning from the system in case of overused CCs (at MS level)	YES
Facilitate cooperation among competent authorities (better communication and sharing of information)	YES (Control Authority and Customs)
Data input by the operator (agent or importer)	NO
Integration of the IT tool in the MS's IT control system	YES
Procedural manual available	NO
Staff have received training and guidelines	YES
The MSs IT tool allows access to third-country IT systems for verification of Catch certificates	NO
100% of CCs and PSs are managed by the IT tool.	YES
Risk-based approach	YES
Risk criteria taken into account	<ul style="list-style-type: none"> • catch not obtained by a vessel included in the IUU vessels list; • crosschecks with the information in the EU mutual assistance system • the total amount indicated in the PS cannot exceed the amount of CC; • the quantity indicated in the invoice may not exceed the amount indicated in CC;

Criteria and Key Elements - Latvia	
	<ul style="list-style-type: none"> the total amount of Indirect import may not exceed the amount of CC.
Supervision procedures in place	Not communicated

Netherlands (NL) – VGC & CCRS

The Dutch Food and Consumer Product Safety Authority (NVWA³⁵) has not introduced a new IT tool to manage the CC verification for imports. Instead, they use an IT tool called Veterinair Grens Controle Systeem (VGC), an already existing tool designed to communicate health certificates between NVWA and Customs. TRACES³⁶ is also currently used by Customs.

VGC is a national IT system used between the operators, NVWA and Customs. It has been designed for health certificates. It is where operators enter the data for import notifications. The operator responsible for the consignment must submit a GGB (Common Health Entry Document) to the NVWA for each consignment.

The CC information is only partly entered by the importers, and the CCs are attached in PDF format in the application. VGC is used by customs to send CCs in PDF to NVWA when they identify a need for further review and investigation on the legality of the catch³⁷. The NVWA receives the CCs in PDF format in the VGC, then verifies the information, perhaps requesting mutual assistance from the third country by email. NVWA waits for 15 days to receive explanations and/or missing information before refusing the shipment. The information is stored in Excel; there is no specific IT tool for that purpose.

The other national IT tool used by the Netherlands is CCRS (Catch Certificate Risk System), an internal software established to enter CC information not as part of the import process but for statistical and “a posteriori” risk analysis purposes. CCRS is also useful as a second round of crosschecks for CCs. If mistakes are found, NVWA informs Customs and/or mutual assistance is requested or the risk level is increased.

The risk factors taken into account are: yellow-carded countries, special species and mutual assistance requests made by the Commission. The overuse of CCs between different Member States cannot be detected because the system is entirely national. Cooperation with other Member States is done by emails and not through the above-described IT tools.

A manual³⁸ in Dutch explains the procedure for handling GGBs (Common Health Entry Documents) in VGC for each part of the inspection of consignments arriving at a Dutch border control post and subject to veterinary inspection. The manual covers TRACES messages, invoice forms and the creation of a file.

³⁵ NVWA web site: <https://www.nvwa.nl/>

³⁶ TRACES web portal: <https://webgate.ec.europa.eu/sanco/traces/>

³⁷ Procedural instructions for revision of CCs in case of suspicion of irregularities (in Dutch):

[https://www.nvwa.nl/binaries/nvwa/documenten/import/veterinair/algemeen/alim15-extra-controle-vangstcertificaten/ALIM15+v+1.0.3+extra+controle+vangstcertificaten.pdf](https://www.nvwa.nl/binaries/nvwa/documenten/import/veterinair/nvwa-import-veterinair/algemeen/alim15-extra-controle-vangstcertificaten/ALIM15+v+1.0.3+extra+controle+vangstcertificaten.pdf)

³⁸ Procedural manual: <https://www.nvwa.nl/binaries/nvwa/documenten/import/veterinair/ks-documenten/gcp-procedures/bpr-23-afhandeling-ggb-in-vgc-en-vorming-van-dossier-van-producten/BPR-23+%28VGC%29+Afhandeling+GDB+in+VGC+en+vorming+van+dossier+van+producten+v14.pdf>

Table 6. Netherlands's system evaluation table

Criteria and Key Elements – Netherlands	
Number of staff for CC verification	5 for CC (+ 10 inspectors)
Procedures for verification of CC for importation	YES
CC management done manually	Partly
Use of the CATCH system by the MS	NO
IT tool established by the MS	Partly (CCRS for statistics and risk analysis)
Legal basis for the use of national IT Tools for CC verification	NO
MS IT Tool Interoperability/linked with CATCH	NO
Warning from the system in case of overused CCs (at MS level)	NO
Facilitate cooperation among competent authorities (better communication and sharing of information)	NO
Data input by the operator (agent or importer)	Partly (CC pdf in VGC)
Integration of the IT tool in the MS's IT control system	NO
Procedure manual available	YES
Staff have received training and guidelines	YES
The MS IT tool allows access to third-country IT systems for verification of Catch certificates	NO
100% of the CC and PS are managed by the IT tool	YES
Risk-based approach	YES
Risk criteria taken into account	<ul style="list-style-type: none"> • High risk countries (yellow card), • IUU vessels • fish species, • mutual assistance from EC
Supervision procedures in place	No quality control but CCRS is used for double checks

Sweden (SE) - Fångstintyg portalen

The Swedish Agency for Marine and Water Management (SvAM)³⁹ is the competent authority for fisheries control. Within the Department of Fisheries Management, three separate units are in charge of the implementation of the IUU regulation. The two units for fisheries inspection (west and east units) are responsible for inspection in ports, the Fisheries Monitoring Centre (FMC) provides those two units with support, and the Unit for Fisheries Compliance and Data Analysis has a coordinating role in addition to performing the administrative controls. SvAM has established on-going cooperation with the Swedish Coast Guard, the National Food Agency and Customs, who meet on a regular basis to discuss relevant issues.

In 2014, SvAM rolled out an IT tool. Since 2015, it has been mandatory to use this web-based IT tool to lodge an import request. This IT tool is called “fångstintygs portalen”⁴⁰ (catch certificate portal). Authorisation is needed to log in⁴¹.

On the client side, the IT tool enables importers to register CCs and any relevant supporting documents. On the server side, a database with a user interface enables authority administrators to verify and validate any documents submitted. The data in the portal can be used upon request by other entities. The tool is prepared to be adapted to CATCH.

During the implementation period of the web portal, importers and agents were invited for workshops. They were informed of advances and cooperated in developing the system. This working method helped SvAM promote the importance of the CC scheme and was of benefit to all involved.

The importer or its agent registers the mandatory information from the CC and attaches a copy of the CC and other required documents in the web application. Figure 2 shows the process for the verification of CCs.

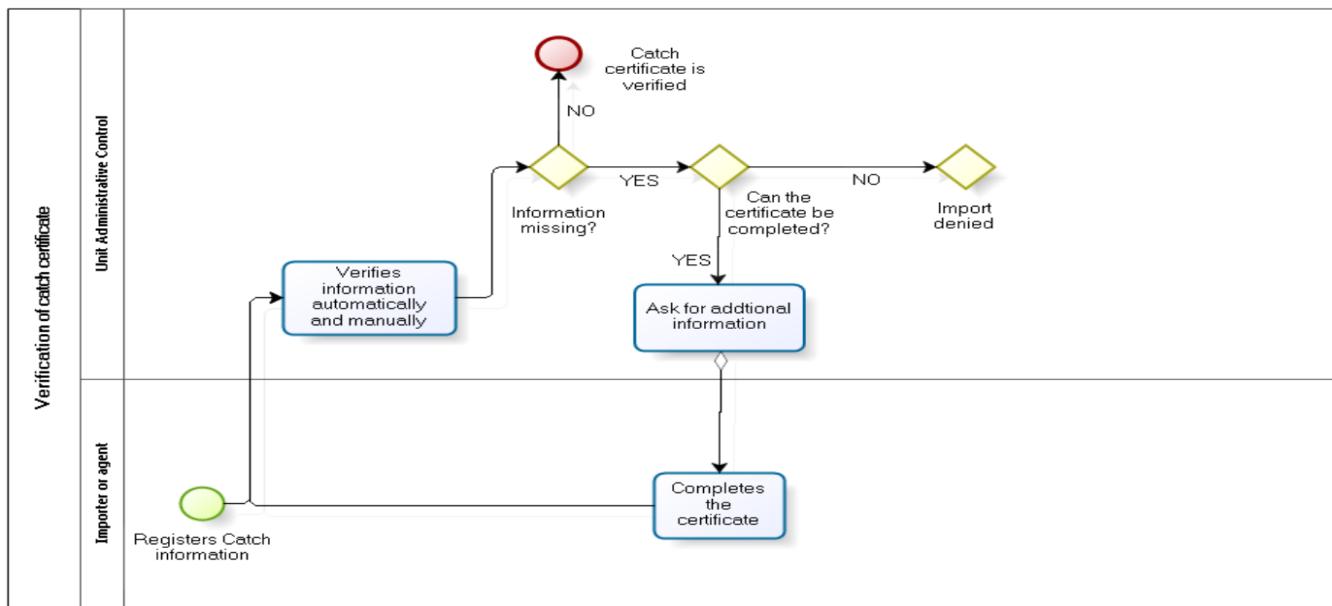


Figure 2. Process for verifying a catch certificate (Source: provided by Sweden SLO)

³⁹ Havs- Och Vatten-Myndigheten web site: <https://www.havochvatten.se/>

⁴⁰ The Swedish CC portal is accessible at: <https://www.havochvatten.se/om-oss-kontakt-och-karriar/om-oss/om-webbplatsen/om-inloggning.html>

⁴¹ The web site for registrations is accessible at: <https://www.havochvatten.se/e-tjanster-och-blanketter/a-o/fangstintyg.html>

All the CCs are checked through the portal with exception of Norwegian CCs, because SvAM get data directly from the Norwegian administration.

SvAM has adopted and implemented the EFCA common methodology for IUU CC verification and crosschecks and uses it as the procedure for verification of CCs for importation. SvAM use a risk-assessment approach in accordance with the Article 17 of the IUU Regulation to verify the CC.

The tool itself enables the authority to perform cost-effective controls with consistent and measurable efforts. Depending on crosschecks of data, the “fångstintygsportalen” can trigger automatic warnings and requests for support from the administrator.

Examples of automatic checks include:

- missing data,
- vessels from the blacklist,
- specific catch certificate,
- specific alerts.

There is a manual in Swedish to support the registration of catch certificates in the IT tool, and this manual can be downloaded online⁴².

Table 7. Sweden's system evaluation table

Criteria and Key Elements - Sweden	
Number of staff for CC verification	1.5
Procedures for verification of CCs for importation	YES
CC management done manually	NO
Use of the CATCH system by the MS	NO
IT tool established by the MS	YES
Legal basis for the use of national IT Tools for CC verification	Not communicated
MS IT Tool Interoperability/linked with CATCH?	NO (but prepared to be adapted)
Warning from the system in case of overused CCs (at MS level)	Not communicated
Facilitate cooperation among competent authorities (better communication and sharing of information)	Not communicated
Data input by the operator (agent or importer)	YES

⁴² Manual in Swedish to support the registration of catch certificates in the IT tool:

<https://www.havochvatten.se/download/18.5f66a4e81416b5e51f7ce9a/1608540595578/manual-fangstintyg-importor-ombud.pdf>

Criteria and Key Elements - Sweden	
Integration of the IT tool in the MS's IT control system	YES (Norway)
Procedural manual available	YES
Staff have received training and guidelines	YES
The MS IT tool allows access to third-country IT systems for verification of Catch certificates	NO
100% of the CCs and PSs are managed by the IT tool.	YES (with exception for Norway/data received)
Risk-based approach	YES
Risk criteria taken into account	<ul style="list-style-type: none"> • missing data, • vessels from blacklist, • specific catch certificate, • specific alert etc
Supervision procedures in place	Not communicated

3.2 Typology of IT systems for Catch Certificate processing

General observations

The information gathered for this study allows us to categorise where Member States are in terms of their digitalisation process.

- Fully paper-based process: 13 Member States are not using IT tools to process CCs (Belgium, Bulgaria, Cyprus, Denmark, France, Hungary, Ireland, Lithuania, Malta, Poland, Romania, Slovakia, Slovenia).
- An IT tool has been developed or is already being used to support the process of monitoring CCs and PSs in the case of the following 13 Member States: Austria, Czech Republic, Croatia, Estonia, Finland, Germany, Greece, Italy, Latvia, Netherlands, Portugal, Spain, Sweden.
- For three Member States (Austria, Czech Republic and Italy), no detailed or very little information has been given in the biennial reports and no replies were given to our questionnaire.
- One Member State (Portugal) gives some details on the IT tools used for the CC scheme but did not reply to our questionnaire.
- One Member State (Greece) has developed an IT solution but has not implemented it, and prefers to continue with a paper-based process until it can start using the EC CATCH application.

- Two Member States are using non-specific IT tools (e.g. developed for health certificates) that have not been developed specifically to manage the CC process (the Netherlands and Portugal) or commercial IT tools (e.g. Excel spreadsheets, SMS management⁴³⁾.
- Six Member States have developed and are using a specific IT tool exclusively dedicated to monitor CCs and PSs accompanying imports. This is the case for Croatia, Denmark, Finland, Latvia, Spain and Sweden.
- Four Member States are using a module of a wider IT system used for fisheries control (Croatia, Latvia, Spain and Sweden) (e.g. SIGCPI is part of SIPE, the Spanish Fisheries Information System).
- Three Member States are using an IT tool where the CCs are attached in pdf format (data from CCs are not typed into the application: Latvia, the Netherlands and Portugal).
- Four Member States are using a fully digitalised IT tool, meaning that all the data are typed in the application: Croatia, Finland, Germany and Sweden.
- Four Member States have an IT tool allowing the operators (importers or agents) to enter information related to the import notification (CCs, PSs and related documents: Finland Germany, Netherlands (partly) and Sweden).
- Seven Member States use their IT tool to evaluate the risks emerging from import notifications (Croatia, Finland, Germany, Latvia, Netherlands (a posteriori), Spain and Sweden).

Typology of IT systems

The table below classifies the Member States according to their different CC verification processes. First, the table shows if an IT system has been established (YES or NO) to manage the verification of CCs.

Then, for the IT systems, the table differentiates between the Members States with non-specific IT tools (if they use applications not specifically designed to manage the CC process) and a specific IT system (where the application has been developed for CC verification).

Some of the specific IT systems can also be integrated into a Member State's wider control system and thus communicate and exchange information with other parts of that system.

Another noteworthy aspect of the IT system is the possibility for the operator to enter the information for the catch certificate process (in Croatia, by contrast, the administration receives the information on paper and types it into the system).

The system is considered to be fully digitalised if the information is entered by typing the data into the application. Other systems only allow the CC and documents in pdf format to be attached to the application. More developed and complex systems have risk-analysis elements. The table below provides a summary of these features, based on the information collected. When there is no answer, this means the information was not available.

⁴³ SMS is an application to manage files

Table 8. Member States' systems comparison table

MS	IT system established	Non-specific system used	Specific IT system used	Integrated in Control IT system	Data input by operators	CC pdf attached	Fully digitalised	Risks assessment integrated
AU	YES							
BE	NO							
BG	NO							
CY	NO							
CZ	YES							
DE	YES		YES		YES		YES	YES
DK	NO							
EE	YES							
EL	YES (but not implemented)		NO					
ES	YES		YES	YES	YES		YES	YES
FI	YES		YES		YES		YES	YES
FR	NO							
IT	YES							
HR	YES		YES	YES	NO			YES
HU	NO							
IE	NO							
LT	NO							
LV	YES		YES	YES	NO	YES		YES
MT	NO							
NL	YES	YES		NO	YES (partly)	YES		YES (a posteriori)
PL	NO							
PT	YES	YES				YES		
RO	NO							
SE	YES		YES	YES	YES		YES	YES
SI	NO							
SK	NO							

Results

A rough evaluation of the different IT tools can be made according to how many features they include. The more features included and combined in the IT system, the more efficient and reliable those systems will be. The places of each Member State in this ranking corresponds to the number of characteristics offered by their IT tool.

The following figure shows the level of digitalisation and automation of the process to monitor the CCs and PSs verifications. The Member States range from those with a fully paper-based process to those with a fully digitalised and risk-based process.

Depending on the number of relevant features that the system has, the ranking ranges from 0 to 6.

A ranking of 0 is for Member States with an entirely paper-based system (no relevant feature in the table).

A ranking of 1 is for Member States with an IT tool with only one relevant feature (an IT tool instead of a paper-based system).

No Member States meet the criteria for a ranking of 2, with two relevant features.

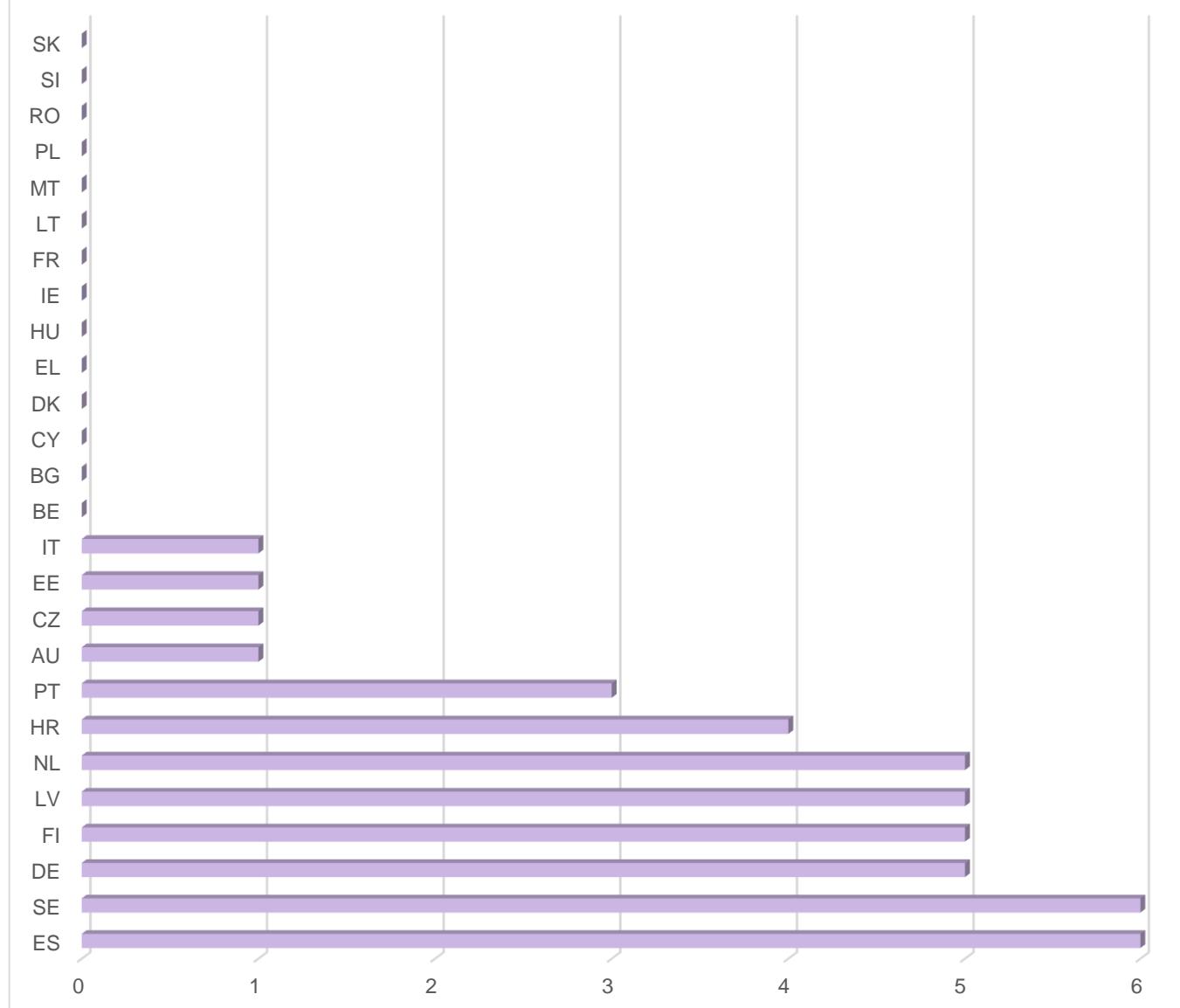
A ranking of 3 is for the IT tools that are non-specific and that allow for the transmission of PDF documents.

The next level, ranking 4, is for Member States with a specific, integrated control system that is risk based but where the information is not entered by the operators.

A ranking of 5 is for IT tools presenting all 5 relevant features.

The maximum level (ranking 6) is reserved for specific IT tools integrated into a control system, fully digitalised and risk based.

Ranking of MS by level of digitalisation of CC verifications.



3.3 Desirable features of an efficient IT system

Typing the data into the application is necessary to allow crosschecks of CC information and to allow the system to detect, among other things, overused and counterfeit CCs. It also makes it possible to crosscheck the data against risk criteria and to detect suspicious import notifications.

Digitalisation (typing the information or attaching the CC in pdf format) also makes it possible to decrease the workload caused by paper-based administration.

Analysis of the biennial reports and the questionnaires confirms that Member States are at very different levels of digitalisation.

The desirable features that should be available in every IT-system to monitor the CCs and PSs accompanying imports are:

- Integrating risk management. This is a key feature of a reliable IT tool, enabling it to compare the data (automatic crosschecks) from the documentation and from the database and raise a warning when there are discrepancies. It is particularly important to identify and determine the weight-balance recorded in the CC and the actual amount of fish imported based on that CC, to prevent importation of unreported fish through the overuse of any particular CC.
- Allowing data entry by typing directly into the application.
- Reducing the workload of the administration by allowing importers/operators to enter all the data through a Web portal.
- Standardising and easing the communication of information between the different entities involved in monitoring importation of seafood; the Competent Authority for fisheries (checking the CC and PS), the veterinary administration in charge of public health (checking the health certificate), Customs (giving clearance to the importation) and the importer. Ideally, the IT system should facilitate communication with other Member States' administrations, the European Commission, the Regional Fisheries Management Organisation (RFMO) and the flag States exporting to the EU. Such communication will allow also the Competent Authority to make decisions about whether to allow imports.
- When possible, the IT tool to monitor the CCs and PSs accompanying imports should be fully integrated into the IT system used for fisheries control by the Competent Authority.

3.4 The next step: a harmonised and EU-wide IT system

The next advance in these IT systems must be to make them interoperable at EU level, so that CCs can be monitored more effectively, reducing the risk of duplicates being used.

It is with this aim that the EC has developed the CATCH⁴⁴ application based on the TRACES⁴⁵ system used by veterinary authorities.

For the time being, no Member State is operating the first version of CATCH already available.

⁴⁴ The CATCH web portal can be checked at : https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Q_CATCH/0.Intro.htm

⁴⁵ The TRACES web portal: <https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Home.htm>

As soon as the new Fisheries Control Regulation comes into force, it will become mandatory for the Member States to use CATCH. It will then be necessary to encourage importers to use it. Currently, the IT Tools created by the Member States are not intended to be connected to or work with CATCH. Interoperability with CATCH will eventually become an important feature for national IT systems. It should be noted that Sweden is preparing its CC portal to be adaptable to CATCH.

4 Case study: a gap analysis between Spain's SIGCPI and the EU CATCH system

4.1 Description of the Spanish system SIGCPI

Since 2010, the Spanish General Secretary of Fisheries (GSF) has developed an IT system to manage requests for imports. An in-depth analysis of the system was carried out by ClientEarth⁴⁶. The system is called the Integrated System for the Management and Control of Illegal Fishing (SIGCPI) and its key features are set out here.

In SIGCPI, all the requested documents, including the CCs, are digitalised. SIGCPI is an import application system that makes it possible to process CCs and PSs as well as to digitalise the data by including it in the database. SIGCPI is interconnected with Customs, and all the import requests applications have to go through Customs. Customs automatically receives the validation of all imports.

Through SIGCPI, applicants open an application file in which they submit the necessary documentation.

SIGCPI use

SIGCPI is used for registration and control of:

- CCs for the authorisation of imports of fishery products;
- transit of fishery products to another Member State;
- operations for access-to-port services and landing/transhipment operations for third-country fishing vessels;
- indirect imports accompanied by a PS and copies of CC; and
- re-export operations for previously imported fish products.

Data registration

For the registration and control of CCs and PSs, accompanying imports, the following data are recorded in the SIGCPI for each application received from importers:⁴⁷

⁴⁶ The Spanish system for the digitalisation of fish imports – SIGCPI:

<https://www.clientearth.org/latest/documents/the-spanish-system-for-the-digitalisation-of-fish-imports-sigcpi/>

⁴⁷ Source: Manual de uso del Sistema Integrado de Gestión para el Control de la Pesca INDNR (SIGCPI) Versión 3.1 – Secretaría General de Pesca – Spain. Downloadable at: https://www.mapa.gob.es/gl/pesca/temas/vigilancia-pesquera/Manual-uso-SIGCPIOPERv3-2015-02-11_tcm37-288247.pdf

- Name and address of the importer, agent and exporter
- Number of the CC and validator country
- Name of the vessel that made the capture, license plate and flag
- Species (AL3 Code) and Catch Area (FAO code)
- Product quantities, presentation, preservation and code (Combined Nomenclature)
- Transport data (container registration, flight number, truck registration, ship name, etc.)
- Country of export
- Expected date of arrival in Spain of the products
- Entry point
- Place where the goods are located
- Date of receipt of the import authorisation request.

Documents archived

In addition, SIGCPI archives scanned copies of the following documents:

Mandatory documents:

- CCs
- PSs together with the respective CCs
- Bills of lading or transport documents
- Health certificates
- Where appropriate, statistical documents for bigeye tuna and swordfish.

Non-mandatory documents (only when needed):

- Fishing/transhipment licences
- Invoices
- Where appropriate, all information relating to the verifications requested from the Competent Authorities.

Data management and automatic crosschecks

The SIGCPI application has the following catalogues against which automatic crosschecks are made:

- Vessels sighted engaging in IUU fishing.
- Vessels included in the IUU list and in mutual assistance messages by the European Commission.
- Countries notified to and accepted by the Commission, as well as the Validator Entities in each of these countries.
- Countries listed as non-cooperative in the fight against IUU fishing.

- Designated/authorised Spanish ports.
- Exporters, importers and authorised agents.
- Combined Nomenclature Codes.
- Alerts from the European Commission.
- Record capture certificates. The application detects CCs that have been used previously (in Spain).

These catalogues make it possible during the processing of authorisation to detect the existence of sighted vessels, of vessels included in the lists of IUU vessels, or of suspicious vessels, as well as certificates issued by countries not notified to the Commission, CCs used previously, and other indicators of illegality.

Data control and crosschecks

The staff of the GSF must carry out documentary checks on 100% of the import authorisation applications received, which involves monitoring 100% of CCs and PSs.

To this end, for each application, the importer or agent (operator) responsible for the application must complete a control checklist before receiving an authorisation through SIGCPI; if this checklist is not completed, the application does not allow SIGCPI to send the authorisation to Customs.

This checklist requires the operator handling and processing the application to confirm that they have verified:

- The documents are valid, there are no missing data and the existing data are not inconsistent. All fields of the CC and PS are checked. If this is not the case, users should modify the application.
- The requested port is within the designated ports for this operation. If not, the users need go to level 2 of control, which means the cancellation of the file and the inspection of the vessel, which will have to request access to an authorised port.
- The fishing vessel and the goods are not included as an alert according to the Spanish risk analysis.

In the event that any circumstances requiring verification with the authorities of the third country or additional documentation are detected during processing, the application has an “incident” module that allows a report with comments to be recorded.

The GSF checks the following information on CCs:⁴⁸

- Model of the certificate submitted by the third country: if it matches the model used by the third country concerned.
- Catching vessel: if it is included in the EU IUU vessel list or if there is any alert of mutual assistance, for example.

⁴⁸ Source: Spain – A progress report on a decade combating IUU fishing – ClientEarth (July 2017), available at <https://www.documents.clientearth.org/wp-content/uploads/library/2017-09-29-the-control-and-enforcement-of-fisheries-in-spain-ce-en.pdf>

- Fishery products: if the product or capture zone area is subject to special control measures or if the flag country of the vessel is a member of an RFMO, for example.
- Declaration of transhipment at sea: for example, if the date of transhipment is after the date of catch or if the area where the transhipment takes place belongs to the EEZ of a coastal country other than the flag country.
- Exporter's details: for example, if the exporter is located in the country issuing the CC or if the date of export is later than the date of catch and prior to the date of import.
- Validation section: for example, if it is signed by the competent authority or if the validation date is after the date of catch.
- Transport information: if the exporting country is the same as the flag country or the country declared by the importer or if it is signed by the exporter, for example.
- Importer's declaration: if it is duly completed and signed and indicates the CN⁴⁹ code.
- Transport movements: for example, if they come through a container.

The GSF checks the following information on PSs:

- If the country validating the CC is on the list of countries notified to the Commission.
- If the CC numbers, vessel names, date of validation and description of catch and weight correspond to those provided on the CC.
- If the products (species, CN code and quantities) correspond to those for which the importer is applying.
- If the model of the PS corresponds to Annex IV of the IUU Regulation.

SICGPI contains automatic alerts:

- If the CC has been used previously in Spain.
- If the flag of the vessel does not correspond to the validating authority.
- When the validating authorities have not been notified to the Commission.
- When the Commission has not been notified by the country.
- If the vessels are included in the EU list of vessels engaged in IUU fishing.
- If the products being imported come from countries that are pre-identified, identified, and listed as not cooperating in the fight against IUU fishing.
- When the vessel has a history of multiple flag changes over its existence.

SIGCPI has the following checklists that make it possible to detect the existence of sighted vessels, of vessels included in the EU list of IUU vessels, of suspicious vessels, and of CCs issued by countries not notified to the Commission:

- Sighted Ships.
- IUU vessels.
- Mutual assistance messages by the Commission.

⁴⁹ The Combined Nomenclature (CN) is the EU's eight-digit coding system, comprising the HS codes with further EU subdivisions. It serves both the EU's common customs tariff and provides statistics for trade inside the EU and between the EU and the rest of the world.

- Countries notified to and accepted by the Commission and validating entities in each of these countries.
- Authorised ports.
- Exporters, importers and authorised agents.
- Combined Nomenclature codes.
- Non-cooperating countries.
- EU Alerts.

In addition to these automatic crosschecks, GSF staff need to complete a checklist before issuing the fish import authorisation. The person who controls and processes the application will verify:

- The information on the CC and PS.
- The data of the importer and the import declaration.
- The fishing vessels listed on the CC.
- Any other circumstance which is detected and may require verification with the authorities of the third country or additional documentation.

However, SIGCPI does not incorporate an automated and thorough risk-analysis tool which could speed up the process and make it possible to target documents produced by third countries and customs inspections more precisely. In addition, the risk assessment is not connected to other Member States' systems, which would detect use of duplicate CCs. This is why the next step should be to start using a pan-European database to pool and cross-reference the data with other Member States and better target which documents produced by third countries and customs inspections need to be checked. Once the legal basis exists, the adoption of the Commission's CATCH system will enable this.

Risk analysis

The SIGCPI application is a very useful tool enabling the operator to assess risks. SIGCPI forms the first filter of the risk analysis.

Spain has implemented different procedures for the control and inspection of third-country fishing vessels accessing Spanish ports and making landings and transhipments in them. Procedures also exist for transit operations and imports and re-exports of fishery products from third countries through containers, lorries, vessels, aircraft or any other means of transport. These procedures have identified the risk factors which over the years have been identified as particularly relevant for monitoring this activity.

The activities which this risk analysis indicates need to be especially monitored, verified and inspected are:

- Access of fishing vessels from third countries to national ports.
- Landings of fishery products from third-country vessels.
- Transhipments of fishery products from third-country vessels.
- Transit of fishery products from third-country vessels.
- Imports and re-exports of goods from third countries.

This risk analysis is based on:

- EC and RFMO lists of vessels engaging in IUU fishing.

- Alerts (Mutual Assistance, Sightings, etc.) of the EC and other Member States, RFMOs, third countries or NGOs.
- A list of suspicious vessels based on international alerts.
- A list of prohibited, protected or more stringent control measures.
- A list of countries pre-identified, identified and listed as non-cooperative in the fight against IUU fishing.
- Inspections/infringements relating to third-country fishing vessels and containers (reasons for infringement, countries, species, zones.)
- Computer applications: REVIPES⁵⁰ and SANCIPES⁵¹.
- Sensitive fishing areas.
- Regulations of the different RFMOs.
- National priorities established for each year on inspection issues (Annual General Fisheries Inspection Plans).
- Trade flows of imports of fishery products in recent years/denials (by country, species, grounds for refusal – weekly, monthly, annual statistical reports of import volume obtained from the SIGCPI database).

Risk assessment

Spain has been developing its risk-assessment approach to detecting imports that have a high risk of originating from IUU fishing since the IUU Regulation came into force⁵².

The risk-assessment criteria have been strengthened over the past decade, but generally include data provided, among others, by:

- EU and RFMO lists of vessels that engage in IUU fishing;
- Alerts (mutual assistance, sightings, etc.) from the Commission and other Member States;
- Notices from third countries or NGOs;
- Lists of suspected ships;
- Lists of species that are prohibited or species of high commercial value;
- Lists of pre-identified countries listed as not cooperating in the fight against IUU fishing;
- Inspections;
- Internal computer applications (REVIPES / SANCIPES);
- Sensitive fishing areas;
- Interpol Purple Alerts or alerts from the EU Food Fraud network;
- Inspections and proceedings for infringements detected;
- National priorities established in the Annual General Fisheries Inspection Plan;
- Trade flows of fishery products imports; and
- Refusals or requests for collaboration from Customs.

⁵⁰ Fisheries Surveillance and Inspection Network 4.0 (Red de Vigilancia e Inspección Pesquera 4.0.-REVIPES) At: <https://apipes.magrama.es/REVIPES/>

⁵¹ National Registry of Infractions (Registro Nacional de Infracciones-SANCIPES). At: <https://apipes.magrama.es/sancipes/>

⁵² Source: ClientEarth: Spain – A progress report on a decade combating IUU fishing.

Depending on the issue identified, the GSF may decide to contact the importer, flag State or country of processing for further information through the verification process; elevate it to the IUU Intelligence Team; or proceed with the physical inspection of the vessel.

Control and inspections driven by SIGCPI

There are three levels of control:

The first level of control is a simple documentary inspection done by the operators and coordinators of the SIGCPI application for requests for port access, landings, and transhipments and for import applications and re-exports.

The second level of control is done by the Heads of Area, Fisheries Inspectors, and Heads of Section of the Sub-Direction of Control and Inspection and covers:

- Monitoring requests for port access, landings and transhipments.
- Supervision of applications for import and re-export.
- Requesting verifications in cases where the information needs to be checked.
- Analysis of information and possible alerts that are detected.
- Control of Spanish waters and port, in coordination with the Port Authorities, Customs, Health Authorities, National Fisheries Inspectors, navy, civil guard, as well as international agencies and NGOs. This control is carried out on the field and by means of vessel detection tools (Vessel Monitoring Systems and Automatic Identification System).

The third level of control is carried out by National Fisheries Inspectors attached to government delegations in the “periphery” (ports, borders, airports, etc.) and covers:

- Control and inspection of port access, landings and transhipments.
- Control and inspection of imports, re-exports and transits.
- Control and inspection of port access, landings and transhipments that may occur in unauthorised ports. Control over the entry of third-country vessels must be maintained at non-designated ports to ensure compliance with the regulations in force.

4.2 Description of the EC CATCH system

All seafood consignments entering EU's single market from third countries (through sea, land borders and air cargo) must be accompanied by a CC to verify that seafood is sourced from the legal fisheries trade.

“CATCH can be used by all operators along the value chain. This is a living project, in which all are involved: The Commission, national authorities, and above all the fishing industry. Real time monitoring of catch certificates in the CATCH database would enable Customs, Fisheries and Port authorities across multiple EU member states to crack down on forgery while enabling faster approval for importers and port agents. The version 1.0 has risk analysis and quantity management” (DG Mare Europe Day 2019 presentation of algorithms to pre-emptively detect misreporting of declared quantities on CCs)⁵³.

⁵³ European Commission (2019) European Commission launches new tool to strengthen EU's fight against illegal, unreported and unregulated fishing, European Commission press release, 7 May 2019.
[\(https://iuriskintelligence.com/catch-a-big-leap-in-switch-from-paper-to-digital-catch-certification-of-imported-seafood-entering-european-union/ \)](https://iuriskintelligence.com/catch-a-big-leap-in-switch-from-paper-to-digital-catch-certification-of-imported-seafood-entering-european-union/)

The European Commission has developed an IT tool to digitalise the paper-based EU certification scheme against IUU catch. CATCH supports Member States in their IUU-related verification tasks to reduce the risk of fraud and to facilitate trade flows.

The European Commission's CATCH is a web-based application that is already working and available for use by Member States. Version 1.0 of CATCH was launched on 7 May 2019 by Commissioner Vella at the Seafood Expo in Brussels⁵⁴. New versions of CATCH with new features and allowing third countries to enter data will be deployed in the coming years.

The application uses the TRACES.NT⁵⁵ system developed by the European Commission, which is a digital management tool already in use since the early 2000s for sanitary requirements connected with the importation of animals, food, feed and plants in all Member States and 60 third countries.

4.2.1 Purpose of CATCH

The purpose of CATCH is to overcome the shortcomings of import control systems that exist only at a national level. Indeed, according to the former Commissioner for Maritime Affairs, Karmenu Vella, “*CATCH will go a long way to addressing many of the shortcomings we are facing today. For example, it will help EU Member States detect suspected fraud and abuse. For example, if partial quantities declared are higher than the overall catch certificate allows; It will simplify and speed up the controls at the EU border by reducing the administrative burden of import authorities; It will help create a level playing-field between Member States, by ensuring that what is rejected in one entry point cannot enter the EU in another country, a very important step in comparison to the old paper-based catch certification*” (Vella, 2019)⁵⁶.

The catch certification schemes as foreseen in chapter 3 of the IUU Regulation^{57 58} is:

- A tool to fight IUU fishing by certifying the legality of the fish;
- Required for all consignments of fishery products destined for the EU market;
- Based on traceability principles;
- Designed to ensure that countries act responsibly and ensure compliance with their own conservation and management rules as well as with internationally agreed rules.

However, in its current format, the Regulation does not plan for a digitalised CC scheme. Meanwhile, it is the paper-based systems that cause potential risks of fraud, burdensome verification for Member State authorities and a lack of a level playing field in terms of implementation in different Member States.

⁵⁴ EC press release: https://ec.europa.eu/fisheries/press/seafood-expo-global-2019_en

⁵⁵ TRACES web portal: <https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Home.htm>

⁵⁶ Press releases: https://ec.europa.eu/fisheries/press/european-commission-launches-new-tool-strengthen-eu's-fight-against-illegal-unreported-and_en and <https://iuuriskintelligence.com/catch-a-big-leap-in-switch-from-paper-to-digital-catch-certification-of-imported-seafood-entering-european-union/>

⁵⁷ 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.

⁵⁸ Source: presentation CATCH The EU-wide database for seafood import catch documentation Webinar ClientEarth/IUU Coalition 24 September 2020 DG MARE Unit B4 (Illegal, Unreported and Unregulated Fisheries Policy) European Commission. Available on ClientEarth website at

<https://www.clientearth.org/latest/documents/presentation-catch-the-eu-wide-database-for-seafood-import-catch-documentation-pawel-swiderek/>

To move from a paper-based system to an IT system, the European Commission developed CATCH as a single EU-wide system:

- To facilitate and support harmonised checks and verifications at EU borders.
- To facilitate cooperation among competent authorities through better communication and sharing of information.
- To avoid abusive use of CCs through EU-wide quantity management that will prevent overshooting declared quantities.
- To support risk analysis.
- To create a level playing field for all operators.
- To reduce the administrative burden for Member States and other stakeholders.

CATCH can be used at the different stages of the catch certification scheme and all along the chain of custody by EU importers (and in future by actors in third countries).

Member States and EU authorities can use CATCH to:

- support the management of CCs, PSs, importer declarations (to automate the process of issuing them) and control and verification procedures.
- centralise digital CCs in a unique EU-wide database.
- support risk management.

4.2.2 Use of CATCH by Member States

In the current proposal for the revision of the European Fisheries control system⁵⁹, the Commission has included provisions to make the use of CATCH obligatory for EU importers. This means that, until the revised Fisheries control system is in force, the use of the system will be on a voluntary basis for all Member State authorities and operators⁶⁰.

4.2.3 CATCH – when and for whom?

CATCH has been developed to be used throughout the supply chain until it reaches the EU market⁶¹ (it does not intervene on the EU internal market itself).

CATCH was launched in 2019 and is available to EU IUU authorities and EU stakeholders on a voluntary basis.

The legal basis for compulsory use of CATCH by EU authorities and EU operators and customs single window integration will be the adoption expected to occur in 2021. The official entry into force will depend on the outcome of the ordinary legislative procedure which is currently ongoing.

⁵⁹ Amendment of Article 12 of the EU IUU Regulation from 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. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018PC0368>

⁶⁰ CATCH - Information Note (of the EC) available at:
https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/catch-it-system_en.pdf
ed and Unregulated Fisheries Policy) European Commission

Table 9.CATCH for who and when? (Source: DG MARE⁶²)

USE OF CATCH	Before the entry into force of the legal basis	After the entry into force of the legal basis
EU Member States (authorities)	Voluntary use	Mandatory use
EU importers/ stakeholders	Voluntary use	Mandatory use
Third-country' authorities	Voluntary use	Voluntary use
Third-country stakeholders/exporters	Voluntary use	Voluntary use

For the moment, CATCH is only accessible to EU Member States' administrations and EU operators. Access for third countries will be granted in a forthcoming version. The CATCH tool allows CCs, PSs and Importer Declarations to be created via the TRACES.NT platform.

In practice, no Member State is already using CATCH, mainly because:

- there are no legal requirements for operators or authorities to use CATCH;
- the operators are still not feeding it with documents; and
- it would be redundant and increase workloads.

Although it will drive a reduction of the administrative burden for all actors involved, the use of the system will remain voluntary for third countries even after the adoption of the new control system. The European Commission cannot impose its system on non-EU countries. However, 60 non-EU countries already use the TRACES.NT platform/environment for food health requirements and importers will probably request third-country operators to introduce digitalised data into CATCH. On the flipside, the more it is used by third countries, the less burdensome it will be for all and the more reliable the information will be.

4.2.4 Functionalities of CATCH

Log in

Currently, CATCH allows users to be logged in as importers or as validating authorities.

Access to the TRACES.NT environment by operators has to be granted by Member State administrations (and later by the administrations of third countries to operators in third countries).

Creation, validation and verification of documents

CATCH makes it possible to create and validate:

- CCs
- Simplified CCs
- PSs and
- Importer declarations.

For the moment, the only validating authorities in the CATCH system are Member State authorities and in respect of import by EU vessels and for re-export of imported fishery products. For the EU vessel

⁶² EC note available at: https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/catch-it-system_en.pdf

importers, the Member State authority has to validate the CC (or simplified CC) corresponding to the EU flag State fishing vessel.

The importer has a validating role in the system which will remain in place until third-country authorities become part of the CATCH system. Validation on a voluntary basis by third-country authorities is foreseen for a future version of CATCH. The importer (in place of the third-country authority) validates the CC or simplified CC and submits the importer declaration to the Member State validating authority. The validating authority verifies the CC or simplified CC and controls the imports.

Crosschecks and risk analysis

In CATCH version 1.0, only a few basic crosschecks will create alerts:

- Quantity overshooting⁶³
- Overuse of CCs.

Future versions of the system will include more risk management criteria. As CATCH is an EU-wide centralised electronic database, all CCs and PSs will be taken into account. The system will ensure that one CC cannot be overused.

4.2.5 Data registration and validation

An importer is currently able to use CATCH to create CCs or simplified CCs (in case of small-scale landings of no more than one consignment happening in the flag State). An importer can also create importer declarations and, if needed, PSs.

The “EU vessel operator” (exporters and importers, using fishing vessels with an EU flag State) can create CCs and simplified CCs and also submit them to the validating authority.

This table summarises the current function and the existing crosschecks (source: CATCH user manual⁶⁴).

Table 10. Summary of the creation, submission and validation of import/export documents by CATCH

Stakeholder	Catch certificate	Processing statement	Simplified catch certificate	Importer declaration	Weight control and crosschecks	
					PS	CC
Operator (importer)	Create and validate	Create and endorse (in place of the third-country authority)	Create and validate	Launch and submit to validating authority for verification	In PS: “catch processed” ≤ “total landed weight”	“Imported weight” ≤ “Total landed weight”
EU vessel operator ⁶⁵	Submit for validation		Submit for validation	Validate the CC or simplified CC		

⁶³ Quantity overshooting is when the amount of imported weight is bigger than the total landed weight. This is checked by the system.

⁶⁴ CATCH user manual available at: <https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Resources/PDFs/final%20catch%20UM%20version%20importer%202.0%20-.pdf>

⁶⁵ Exporter/Importer, with an EU Member State flagged fishing vessel (CATCH user manual).

Stakeholder	Catch certificate	Processing statement	Simplified catch certificate	Importer declaration	Weight control and crosschecks	
					PS	CC
MS validating authority	Validation of CC submitted by EU vessel operator		Validation of simplified CC submitted by EU vessel operator	Importation control (verification of CC)		Warning in case of overused of CC in declaration import

The CATCH system's features and operating instructions are explained in the user manual available on the CATCH portal of the European Commission⁶⁶.

Below is a description of the types of entries that can be made in the system:

Create a new CC (logged with an importer role)

The system displays an electronic "European Community catch certificate" creation page, allowing the user to feed the CATCH application with all the required information including:

- Commodities (HS code from the World Customs Organization)
- Details of catch (i.e. details of the certificate itself)
- Validating authority.

The system validates the Local Reference Number of the CC.

Validation of CCs

CCs are issued by third countries exporting to the EU and by Member States exporting outside the EU (and re-importing exported goods).

As a result, there are three situations calling for validation of CCs.

The first one is for the import of fishery products to a Member State. In this case, it should be the flag State authority that validates the CC; but as CATCH is still not accessible to third countries, the importer validates the CC in the system instead of the flag State authority.

The second situation concerns fishery products from EU vessels that are imported to the EU. The Member (flag) State should validate the CC through CATCH.

Finally, fishery products that are to be exported from the EU and then are re-imported into the EU require the validation of a CC.

When the user logged in is an importer, validation of the CC involves the following steps:

- Submission of flag State authority validation.
- Submission of a signed Declaration as the importer.
- Generation of a new serial number for the CC by the system.

⁶⁶ Web portal of CATCH: https://webgate.ec.europa.eu/cfcas3/tracesnt-webhelp/Content/Q_CATCH/0.Intro.htm

- Preview of the certificate in PDF format with the possibility to print.

When the user logged in is a validating authority, this means that the importer and/or exporter is an EU vessel operator and has submitted a CC for validation.

The electronic version of the "European Community Catch Certificate" creation page is displayed, providing the validating authority the following information tabs:

- Details of catch - where the details of catch were entered.
- History icon - to view any previous status the CC may have had.
- Current status - to view the current status of the certificate.

The Competent Authority can:

- verify the information in the certificate and edit it, if necessary.
- validate the certificate as the flag State authority, i.e. state if this certificate is Clearable or Not Clearable.
- sign the declaration as the MS relevant authority.
- preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Creation of a simplified Catch Certificate⁶⁷

This involves an importer entering the following information:

- Select commodities:
 - Details of Catch – entering the details of the certificate itself
 - List of vessels – list of small fishing vessels which made the catches
- Validating authority
- Local Reference Number
- References to applicable conservation and management measures
- Supporting documents (the mandatory accompanying document is the original simplified CC).
- Description of products
- Exporter's name
- Means of Transport (rail, road vehicle, airplane, ship)
- Port/airport/other place of departure
- List of vessels (the purpose of this box is to complete, for each commodity, the mandatory sections "Species", "Fishing Vessel", "Port of landing" and "Quantity").

Validation of simplified CCs

Submitting a simplified CC for validation

This step is only necessary for an EU exporter or importer that is dealing with fishing vessels with an EU flag State. The steps for this are to:

- Submit the document for validation as exporter/importer.

⁶⁷ Catches from third-country fishing vessels that meet the criteria of small-scale fisheries, which are landed in the flag State of those vessels and which together constitute one consignment may be accompanied by a simplified CC (Article 6 of the EC Regulation 1010/2009 Detailed rules for the implementation of 1005 2008).

- Preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Validation of a simplified CC (logged in as an importer or a MS authority)

Logged in as an Importer

When the importer signs the validation of a simplified CC, (s)he is declaring that the certificate in CATCH is a true copy of the original certificate signed by the validating flag State authority. The steps are to:

- sign the declaration as importer; at which point a new serial number of the catch certificate appears.
- preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Logged in as a validating authority

This is only necessary if an EU exporter or importer, dealing with a fishing vessel with an EU flag state, has submitted a CC for validation.

The electronic version of the "European Community Catch Certificate" creation page is displayed, providing the following information tabs:

- Details of catch – where the details of the certificate itself are entered.
- List of vessels – list of small fishing vessels which made the catches.
- Current status – to view the current status of the certificate.

The Flag State authority can:

- sign the declaration as the relevant authority.
- preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Launching an importer declaration

After introducing all the details in the catch certificate (including its validation) an importer will need to launch an importer declaration. To do this, the importer must include:

- supporting documents
- references to applicable conservation and management measures (conservation and management measures associated with the species for which the CC is issued)
- description of the products: the mandatory sections are "Species", "Catch Area", coastal State(s) and "Exclusive Economic Zone", "From date", "Final date", "Estimated live weight" and "Estimated landed weight"
- "Fishing Vessel" (only vessels flying the flag of the validating authority can be inserted), which will automatically be partially completed (country, IMO Number, Call Sign, Inmarsat Number, Licence reference and Type of processing authorised on board, Master of fishing vessel)
- declaration of transhipment at sea (only if applicable): "Estimated weight, transhipment date and transhipment position", "Receiving vessel and Master of receiving vessel"
- transhipment authorisation within a port area (only if applicable): "Landed weight", "Port of landing"

- exporter's name
- means of transport: "Port/airport/other place of departure"
- select commodities.

The electronic version of the "Catch/Importer Declaration" creation page is then displayed, providing the following information tabs:

- Details of Importer Declaration - where the relevant information is entered.
- History icon - which shows any previous status of the declaration.
- Current status - to view the current status of the declaration.

The importer must then provide the CC commodities, which means entering the "Imported weight", i.e. the quantity of imported fishery products. **This will trigger a check by the system: The amount of "Imported weight" must be the same or lower than the "Total landed weight".** The importer must then enter the following:

- Importer's name
- Import control authority
- Person responsible for the load
- Legal basis for importation under the IUU regulation. The applicable legal basis must be chosen from:
 - Council Regulation No 1005/2008, Article 12: Direct importation
 - Council Regulation No 1005/2008, Article 14 (1): Indirect importation of fishery products constituting one single consignment, transported in the same form (i.e. without processing) to the Community from a third country other than the flag State
 - Council Regulation No 1005/2008, Article 14 (2): Indirect importation of fishery products constituting one single consignment and which have been processed in a third country other than the flag State.
- Supporting documents
- Means of transport after border inspection post.

Submitting the importer declaration for verification

Submission as an importer

The importer declaration with accompanying documents must be submitted for verification by the relevant Member State's competent authority. The authority has to sign the declaration if the checks do not disclose anything irregular.

Signature of a statement

The importer selects "sign declaration as an importer" to sign the declaration by the processing plant.

The statement is then signed. The current status then becomes "issuing operator declaration signed". A new serial number for the statement appears.

The endorsing authority must then endorse the processing statement.

Endorsing a Processing Statement

This mandatory section must be signed by the importer in place of the endorsing authority of the third country that is controlling the processing plant, confirming the original statement. There are two steps for the importer:

- Select "sign declaration as the importer".
- Preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Launching an importer declaration with a processing statement

After "endorsing" the processing statement, the importer will need to launch the importer declaration.

Importation control

Only a user with a Member State authority role may verify a certificate.

The electronic version of the "catch/Importer declaration" creation page is displayed, providing the relevant authority the following information tabs:

- Details of Importer Declaration – where the details of the Importer declaration have been entered.
- History icon – to view any previous status of this declaration.
- Current status – to view the current status of the declaration.
- Verification – where the authority can verify the information in the certificate.

At this point there is an important crosscheck: the relevant authority will receive a warning from the system in case of overused CC. The process then continues:

- Verification requested – date: In this non-mandatory box, the authority can insert the date and time at which a request is sent to another competent authority.
- Verification of the consignment by the relevant Member State's competent authority: the authority can enter the conclusion and state if the importation is authorised or suspended.
- Signature of the declaration as the relevant authority.
- Preview of the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time

Creation and endorsement of a PS

An importer does the following to create and endorse a PS.

Creation of processing statement

- Select commodities

The electronic version of the "Processing Statement" creation page is displayed, providing the following information tabs:

- Details of Processing Statement – where the importer needs to enter the details of the statement itself.
- History icon – to view any previous status of this statement.
- Current status – to view the current status of this statement.

Information to be completed:

- Processed fishery products

- CC commodities
- Catch processed – quantity of imported catch used for processing
- Processed fishery products – quantity of processed fishery products.

At this point there is a check by the system: the amount of “catch processed” must be the same or lower than the “total landed weight”.

- Name and address of processing plant: the information is automatically completed (country, ISO code, Activity Type, Activity ID and Address)
- Name and Address of Exporter
- Corresponding Health Certificate.

Signature of the statement

The declaration by the processing plant section is to be signed by the importer in place of the person in charge of the processing plant, confirming the original statement. Once the importer signs the declaration as the importer, a new serial number for the statement appears.

The endorsing authority must then endorse the processing statement.

Endorsing a Processing Statement

This mandatory section is signed by the importer in place of the endorsing authority of the third country that is controlling the processing plant, confirming the original statement. This involves three steps:

- Signature of the declaration as an importer
- Endorsement of the PS then occurs (“Valid” status)
- Preview of the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

Launching an importer declaration with a PS

After “endorsing” the processing statement, the importer needs to launch the importer declaration.

There are several ways (detailed in the CATCH manual) to link the CC with the PS.

Then the importer launches the Importer Declaration following the same steps as described above for “launching an importer declaration”.

4.2.6 Importation control

Verification of the CCs by the relevant Member State’s competent authority

Currently verification of CCs can only be done by a user logged in as a Member State authority.

- The CC can be selected on the TRACES.NT home page by typing the reference number of the importer declaration or running an “advanced search”.
- The correct certificate can be selected by clicking on its reference number.

The electronic version of the "Catch/Importer Declaration" is displayed, providing the user with the following information tabs:

- Details of importer declaration – where the details of the Importer declaration were entered.
- History icon – to view any previous status of this declaration.
- Current status – to view the current status of the declaration.
- Verification of the information in the certificate.

Note: A warning from the system is received in case of overused CC.

Verification of the consignment by the relevant Member State's competent authority

At this point the Member State's competent authority indicates their decision, entering "Authorised" or "Suspended".

The import declaration is then signed by the relevant Member State authority:

- Suspended (status REJECTED) or
- Authorised (status VALID).

At this point it is possible to preview the certificate in PDF format and print from the PDF viewer, if required. The PDF can be printed in several languages at the same time.

4.3 Comparison between the Spanish system and the EC CATCH system

The systems used in the Member States to avoid imports of catch from IUU fisheries are mainly paper-based and have been developed within Member States. Some Member States, like Spain, have developed national IT tools to support and automate their paper-based processes.

The EC CATCH tool is a common EU-wide IT tool that will assist controls significantly once it is in use in the Member States.

SIGCPI supports a national scheme to share documents between fisheries and customs authorities to determine the outcome of a control procedure, whereas CATCH is an EU-wide system. This means that with CATCH, crosschecks of information can be done between all the Member States. Version 1.0 of CATCH runs crosschecks of CCs and related documents submitted to other Member States. This is a significant improvement. In addition, SIGCPI is not currently compatible with the EC CATCH tool and only contains information from Spanish imports. The current paper-based catch certification scheme done separately by each Member States does not detect the double use of the same CC to import multiple consignments through multiple entry points into EU Member States, especially when products are entering the EU via a Member State that is not the final destination (market) for the product. SIGCPI is therefore not able to crosscheck information at EU level. SIGCPI is therefore not as effective as it could be at detecting counterfeit CCs.

SIGCPI does not mean the end of paper-based systems. The CC scheme is still paper-based. The CCs need to be printed out prior to the operator introducing the data manually into the system. SIGCPI is not connected with third-country systems that are fully digitalised (such as in the USA or Canada). CATCH, in this first version, digitalises the process between operators and the authorities. In the future, CATCH will be accessible to non-EU countries that already use TRACES.NT. With CATCH, the workflow is currently importer driven: the importers enter data taken from paper-based documents into CATCH.

Currently, there is no legal basis for requiring Member States to use CATCH. It will be the case after the adoption of the new Fisheries Control Regulation. For now, CATCH can only be used on a voluntary basis. In actual fact, the Member States are not using it, partly because CATCH is not fed by documents from non-EU countries. Putting an end to paper-based systems once and for all will require third countries to issue CCs directly in digital format into the system.

The table below summarises and compares key features of both systems.

Table 11. Comparison between SIGCPI and CATCH

Key features	SIGCPI	CATCH
Paper-based process	Paper documents are scanned and entered into the system by the operators.	Partly (because third countries have no access to CATCH): importers have to feed the system with information to create CCs.
Importer driven process	Yes.	Yes.
Data input	Digitalised (from paper documents).	Digitalised (from paper documents).
Communication through the Value Chain	SIGCPI can connect with Customs in real time concerning authorisations. SIGCPI can establish contact with applicants and administrations through the system.	As CATCH uses the TRACES network, it connects all the users using it. In a future version, third countries will be able to introduce information and the system will become fully electronic.
Connected to third-country digital systems	No. SIGCPI refuses data input directly from third countries (it is not possible to generate the certificate in the system).	Not yet. It will be possible soon in a future version.
Avoids over-use of CCs	Yes, at Spain level, No at EU level.	Yes.
Detects counterfeit CCs	Yes, at national level.	Yes.
Automatic Alerts	<ul style="list-style-type: none"> • If the CC has been used previously in Spain. • If the flag of the vessel does not correspond to the validating authority. • When the validating authorities have not been notified to the Commission. • When the countries have not been notified to the Commission. • If the vessels are included in the EU list of vessels engaged in IUU fishing. • If the products being imported come from countries that are pre-identified, identified, and listed as not cooperating in the fight against IUU fishing. 	In Version 1.0: <ul style="list-style-type: none"> • Quantity overshooting • Overuse of catch certificates Future versions will be improved with the development of an integrated risk-analysis tool.

	<ul style="list-style-type: none"> When the vessel has a history of multiple flag changes over its existence. 	
Risk analysis tool	SIGCPI supports risk assessment as it makes it possible to detect sensitive consignments. There is no data-crossing system or connection between the data. SIGCPI does not automatically monitor quantities, but it does monitor reuse of certificates.	Crosschecks to avoid double use and to monitor quantity.
Area covered	Only national level (not an EU-wide database).	EU level (EU-wide database, once user is mandatory).

As seen in the table above, CATCH is the only EU-wide IT database system for the digitalisation of CCs that allows authorities to share and cross-reference the CCs required for each consignment of fishery products entering the EU and the development of an integrated risk analysis tool. This centralised system will facilitate a harmonised approach to risk analysis and verification among the Member States and will prevent importers using the Member States with the weakest import control systems and resources to access the EU's single market.

5 Discussion point: monitoring the impact of catch certificate schemes

In its 2016 report on illegal, unreported and unregulated fishing⁶⁸, the FAO concluded that “*IUU fishing remains one of the greatest threats to the sustainable use of fishery resources. Unfortunately, the dynamic, adaptable and clandestine nature of IUU fishing makes it impossible to estimate its impact in a straightforward way. However, rough calculations indicate that IUU fishing across the world’s oceans weighs in at around 11–26 million tonnes of fish each year, representing an annual price tag of EUR 9–21 billion*”.

5.1 The report from the European Commission to the European Parliament and the Council on the application of the IUU Regulation

To support continuous improvements, Article 55(2) of the IUU Regulation requires the Commission to draw up a report every three years to be submitted to the European Parliament and to the Council. The report is based on the biennial reports of the Member States and the Commission’s own observations.

⁶⁸FAO 2016 - Illegal, unreported and unregulated fishing at <http://www.fao.org/3/a-i6069e.pdf>

The last report from the Commission was published in December 2020⁶⁹ and explains the political and legal advances made in the fight against IUU fishing and the improvements made with EU and non-EU countries.

The report makes clear that “*to further improve the capacity of the IUU Regulation and the EU framework to counter, combat and eliminate IUU fishing, it is important to adopt and implement the revised EU fisheries control system swiftly. This includes the digitalisation of the catch certification scheme*”.

5.2 Trade flow variations

The question we aim to answer here is whether the measures provided for in the European legal framework are enough to stop IUU fishery products from entering the EU market.

ClientEarth and the EU IUU Coalition have shown that the weaknesses in EU countries’ current import control schemes and uneven standards across the bloc could be creating loopholes for products sourced illicitly or linked to IUU fishing. Several of the largest importing countries in the EU, such as Spain, Germany or France, receive between 40,000 and 60,000 paper catch certificates every year. Trends in trade flows suggest that operators may be exploiting certain EU borders that have weaker controls⁷⁰.

As a consequence of the different ways the Member States are verifying the import of fishery products (from paper-based to fully digitalised processes), one of the problems is the reliability and efficacy of how they carry out import controls. CC checks are not carried out in a uniform manner across the EU and the risk assessment criteria are not the same. There is no standard approach to physical inspections of consignments of goods in containers, and there are no harmonised criteria at the EU level for establishing the circumstances under which consignments must be refused entry into the EU⁷¹.

For example, a study on “The impact of the EU IUU Regulation on Seafood Trade Flows⁷²” found declines in imports. Those drops were in many cases observed prior to and following a yellow carding decision. However, variations were observed across Member States.

- Italy reported sudden increases or random peaks in trade that coincided with the yellow carding decisions for eight out of the 13 carded countries authorised to export seafood to the EU during the period 2005-2016. These trade anomalies primarily concerned tuna (frozen, whole; fillets/meat; prepared and preserved) and swordfish (fresh/chilled and frozen, whole; fillets/meat).
- There was an abnormal import trade flow between Portugal and Spain. From 2012, Portugal reported an increase in the number of imports of certain products – such as swordfish – from countries pre-identified or identified as not cooperating in the fight against IUU fishing. This coincided with a decrease in imports reported by Spain and an increase in intra-Community trade

⁶⁹ Report 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 (IUU) fishing (the IUU Regulation) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0772>

⁷⁰ <https://www.clientearth.org/latest/latest-updates/events/going-digital-why-an-eu-wide-database-can-help-stop-imports-of-illegal-fish/>

⁷¹ The EU IUU Regulation. Analysis: Implementation of controls on imports of fishery products in the EU". Executive summary – March 2017 at <https://eu.oceana.org/es/prensa-e-informes/comunicados-de-prensa/un-analisis-concluye-que-los-controles-la-importacion-en>

⁷² The impact of the EU IUU Regulation on seafood trade flows: Identification of intra-EU shifts in import trends related to the catch certification scheme and third country carding process. At http://www.iuuwatch.eu/wp-content/uploads/2018/02/TDA_report_IUUwatch_LQ.pdf

from Portugal to Spain. This suggests a shift towards importing products through Portugal, which may be linked to disparities in the implementation of import controls.

- The Netherlands and France also reported increased imports or peaks in trade following the Regulation's entry into force or around certain carding decisions (e.g. the Netherlands for prepared and preserved tuna from Ghana and Thailand, and France for frozen swordfish and shark from Belize, frozen yellowfin tuna from the Philippines and fresh/chilled yellowfin tuna from Sri Lanka).
- Random peaks in trade and other trade anomalies were reported by Member States that are not considered major importers of seafood in the EU (e.g. Austria, Belgium, Bulgaria, Croatia, the Czech Republic, Latvia, Lithuania and Poland).

5.3 The Commission's role

The European Commission must ensure that the EU's Common Fisheries Policy is implemented in a harmonised way by EU Member States, in particular when it comes to the implementation of the IUU Regulation. This would ensure equal standards for the control measures applicable to imports of fishery products and ultimately, the establishment of a level-playing field and non-discrimination between EU operators⁷³.

The EU's authority and credibility would benefit if the report from the EC to the Parliament and the Council on the application of the IUU Regulation were to be backed by quantifiable data.

One option to make this possible is to analyse import data. Abnormal trade flows of fishery products from non-EU countries and between Member States are of particular concern. The next step should be to analyse trade flow data related to species under the IUU Regulation to show that some changes could be related to import of IUU fishery goods.

What is needed is:

- Disaggregated data about imports to Member States from third-countries for each of the fishery products under the IUU Regulation (except for the products listed in Annex 1 of the IUU Regulation⁷⁴).
- Disaggregated re-export data between Member States.
- Intelligence information from third countries would be valuable as it would make it easier to choose the species and trades to investigate and reduce the amount of data to analyse.

Imagine a specific product imported from one third country to the State where it is marketed declines, while there is an increase in imports to another Member State. If this trade flow is the result of re-export from the second Member State to the first, imports of IUU fishery products ought to be suspected.

⁷³ Report ClientEarth: Intra-EU trade in fishery products bound for Spain: Possible traffic control measures for illegal fishery products - June 2019 at <https://www.documents.clientearth.org/library/download-info/intra-eu-trade-in-fishery-products-bound-for-spain-possible-traffic-control-measures-for-illegal-fishery-products-2/>

⁷⁴ 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.

5.4 Preliminary conclusions and need for further research

The first conclusions that could be made from an historic analysis (for example from 2000 to 2020) are as follows:

- If the suspicious cases have decreased since the implementation of the IUU Regulation in 2010, it could mean that the application of the IUU Regulation is giving encouraging results.
- It is nonetheless important to investigate the relationship between the reliability of the control system for CCs in a given Member State and the re-export of fishery goods from that Member State to other Member States where they are being marketed.

Investigating this connection more thoroughly would be crucial for:

- The risk analysis conducted by the Member States and the EC, in particular for identifying high-risk products coming from some third countries.
- Intelligence investigations on the importers and other actors in the value chain in Member States.
- The Member State re-exporting, which will be able to identify weakness in its control system.
- The EC, as it indicates which third countries are suspected of IUU fishing and will want to take action to deal with a lack of a level playing field across the EU.
- Those identifying species prone to IUU fishing.
- The third country control authorities, who should investigate the value chain of the species fisheries in the country.

The experience gained in this sort of analysis and investigation could be useful to improve CATCH. The CATCH system's monitoring of information related to movements of fishery products imported from third-countries could help develop the application in a way that enables the EC to monitor trade flows. The CATCH application could provide statistics and map the changes in trade-flows trends. It could show variations in patterns (e.g. flows from one Member State to another).

5.5 Monitoring of available data by NGOs

Global Fishing Watch, an independent, international non-profit NGO, is promoting ocean sustainability through greater transparency. They use cutting-edge technology to visualise, track and share data about global fishing activity in near real-time and for free⁷⁵. “*After just over a year at the helm, Global Fishing Watch CEO, Tony Long, reflects on how a freely accessible and near real-time digital map of the global ocean is exposing illegal fishing and changing the rules of the game, and calls on all governments to contribute data and join the movement for universal transparency*”⁷⁶. This initiative increases standards of transparency across the sector and allows for those who comply with the law to be “tracked easily and openly, demonstrating their compliance”⁷⁷. Those who do not comply will stand out. Reward systems can then be implemented and national authorities can capitalise on analyses done by partners.

⁷⁵ Global Fishing Watch web site: <https://globalfishingwatch.org/>

⁷⁶ Global Fishing Watch 2018 – the year in transparency: <https://globalfishingwatch.org/data/global-fishing-watch-2018-the-year-in-transparency/>

⁷⁷ Global Fishing Watch web site: <https://globalfishingwatch.org/>

Publicly accessible databases exist and provide data on fisheries trade flows. These include the EU's Eurostat database⁷⁸, the UN's Comtrade⁷⁹ and the FAO's FishStatJ⁸⁰. Previous studies⁸¹ have shown how analysis of these datasets can support the fight against IUU fishing, including through the detection of trade anomalies indicative of IUU fishing activities and the assessment of the effectiveness of trade or market-related measures. However there have been relatively few analyses of trade flows to assess the effectiveness of import control systems.

6 Conclusions and recommendations

6.1 Conclusions and recommendations to Member States

As much as 13 Member States⁸² continue to verify CCs on paper and have not established IT tools to assist them. They should be encouraged to use CATCH on a voluntary basis, encouraging the operators to enter data into the web-application.

An additional 13 Member States⁸³ have IT tools to facilitate the monitoring of CCs. According to the needs of each Member State, they should switch to CATCH or adapt their IT system and link it to CATCH. Only national systems interoperable with CATCH can take advantages of the centralised EU database.

Four Member States⁸⁴ have an IT tool allowing operators (importers or agents) to introduce information related to the import notification. The operators using those systems should transition from paper-based to digitalised import notifications. Workshops with exchange of experiences could be organised by EFCA to support the Member States that are not yet using digitalised systems.

Member States have improved the verification of the legality of imports but there is a need to access a single EU-wide database to avoid double use of CCs, fraudulent CCs, and overuse of CCs and PSs. CATCH will fill this need.

Each Member State has established its own procedures and in some cases IT tools. The use of CATCH will harmonise procedures and risk-based standards for the verification of CCs among Member States.

⁷⁸ Eurostat website: <https://ec.europa.eu/eurostat/data/database>

⁷⁹ UN Comtrade web site: <https://comtrade.un.org/>

⁸⁰ FAO FishstatJ web site: <http://www.fao.org/fishery/statistics/software/fishstatj/en>

⁸¹ See, for example: Lack, M. and Sant, G. (2001). "Patagonian Toothfish: Are Conservation and Trade Measures Working?" Traffic Bulletin Vol. 19, No. 1: <http://www.traffic.org/publications/patagonian-toothfish-are-conservation-and-trade-measures-wor.html> ; Willock, A. (2004). "The Use of Trade and Market Information to Assess IUU Fishing Activities", presentation at the OECD IUU Workshop, 19-20 April 2004:

<http://www.oecd.org/tad/fisheries/31652387.pdf> ; WWF (2012). "WWF Uncovers Massive Unreported Trade of Atlantic Bluefin Tuna through Panama", 31 October 2012: http://wwf.panda.org/wwf_news/?206573/Panama-trading-in-unreported-bluefin-tuna ; TRAFFIC International and WWF Australia (2011). Continuing CCAMLR's Fight Against IUU Fishing for Toothfish. CCAMLR-XXVII/BG/38.

<https://www.ccamlr.org/en/ccamlr-xxvii/bg/38> ; Bürgener, M (undated). "Fisheries Trade Data Analysis – a Tool in Tackling Illegal Fishing and Related Trade", presentation: <https://www.ccamlr.org/es/system/files/Day%204%20-%20Session%202%20-%20Fisheries%20Trade%20Data%20Analysis%20-%20Markus%20B%C3%BCrgener.pdf>

⁸² Belgium, Bulgaria, Cyprus, Denmark, France, Hungary, Ireland, Lithuania, Malta, Poland, Romania

⁸³ Austria, Czech Republic, Croatia, Estonia, Finland, Germany, Greece, Italy, Latvia, Netherlands, Portugal, Spain, Sweden.

⁸⁴ Finland Germany, Netherlands (partly) and Sweden.

Seven Member States⁸⁵ use IT tools to evaluate the risks related to the import notifications. Following the introduction of CATCH, Member States should establish a shared risk management at the EU level. Workgroups should be organised for that purpose with the technical support of EFCA and the organisation of courses and publication of guidelines.

In parallel with the conclusions and recommendations made in point 6.3 (below), Member States should improve their collaboration with NGO for trade flows analysis and in the same way that they receive support in the detection of irregularities in the VMS⁸⁶ tracking of fishing vessels. Member States' fisheries control authorities could ask for NGO support to analyse trade-flow data.

6.2 Conclusions and recommendations to the Commission

Regarding the use of CATCH by Member States

Conclusion: The use of CATCH by the Member States will be of considerable benefit because CCs will be monitored more effectively. The risk of CC duplicates will be reduced. As it uses TRACES.NT, CATCH will also increase the effectiveness and relevance of transit checks through easier information sharing between importers, fisheries authorities, Customs and the veterinary administration. CATCH will harmonise procedures and risk-based standards for verification of CCs among Member States.

Recommendations:

- Encourage the use of CATCH even before it becomes mandatory.
- Enhance the transparency of the conclusions and recommendations made following inspections and audits by fishery inspectors (DG MARE, EFCA). This should be done by publishing the inspection and audit reports related to fisheries control in EU Member States and non-EU countries. The objective is not to blame the authorities but to make public the recommendations and lessons for all stakeholders of the fisheries sector. The Competent Authority of the country concerned should be given the opportunity to comment on the report at draft stage. This could be done as it is for audit reports made by the Directorate F (Health and food audits and analysis), the former FVO inspectors of DG SANTE. Following visits to the Member States and third countries, findings should be presented in audit reports with conclusions and actions to be taken that are published on the internet⁸⁷.
- Promote workshops and seminars between Member States and with third-country authorities and exporters to share experiences and recommend ways forward.
- Promote courses and seminars with the third-countries to promote the paperless catch certification scheme and encourage use of CATCH.

⁸⁵ Croatia, Finland, Germany, Latvia, Netherlands (a posteriori), Spain and Sweden

⁸⁶ Vessel Monitoring System for fishing vessels

⁸⁷ DG SANTE's audit reports, annual reports and work programs are available under:

http://ec.europa.eu/food/audits-analysis/audit_reports/index.cfm ,
http://ec.europa.eu/food/audits_analysis/annual_reports/index_en.htm and
http://ec.europa.eu/food/audits_analysis/audit_programmes/index_en.htm

- Published a “good practices” manual related to the paperless catch certification scheme and the CATCH system.

Regarding the next developments for CATCH

Conclusion: The European Commission would benefit from the experience of the Member States. Given the accumulated valuable experience of and lessons learnt by Member States who already have a digitised system, one way to improve CATCH could be for the Commission to promote meetings and seminars so that Member States and the different participants can share and take advantage of each other's experiences.

Recommendations:

- Develop a tool allowing all Member State competent authorities to be informed of the status of a consignment of fishery products to avoid re-export of refused consignments.
- Develop a shared risk-assessment and risk-management system used by all the Member States (levelling and improving the playing field) and to be integrated into CATCH by mutual agreement.
- Based on experience gained by Member States with their own IT tools, implement automated crosschecks and warnings within the system, robust risk criteria, and integrated data sources to facilitate identification of high-risk consignments. This should improve the effectiveness and efficiency of the CC scheme in detecting and blocking IUU products.
- Improve the interoperability of CATCH and national IT tools established by Member States to monitor CCs. Allow integration of CATCH with other IT systems within the EU and with third countries (e.g. to enable electronic certificates to be exchanged among all EU customs administrations, to give access to databases of inspection reports and sanctions to build a history of fishing vessels and masters, and to connect to RFMO databases and non-EU systems validating CCs).
- Encourage third countries to join the digitalisation of the CC scheme. As a digitalised IT system, CATCH will be a real-time database once third countries enter their information into the system. To achieve a fully paperless environment, third countries' administrations, as well as exporters, will have to use the system.
- The CATCH system's record of all the information related to fisheries movement of fishery products imported from third countries will make it possible for the EC to monitor trade flows. The CATCH application could provide statistics and map the changes in trade-flow trends. It could show variations in patterns (e.g. flows from one Member States to another). The record of all the data could also be of great help in the preparation and harmonisation of biennial reports.

6.3 Conclusions and recommendations to other stakeholders

Conclusion: to date, relatively few analyses of trade data at a holistic level have been carried out, either to assess the impacts of the IUU Regulation on seafood trade flows or to support implementation of the Regulation through detection of trade flow anomalies related to potential IUU fishing activities.

Recommendation: Just as Global Fishing Watch monitors VMS tracking, further analysis and monitoring of trade data by NGOs could highlight abnormal flows of fishery products from third countries and

between Member States. This could be of great assistance for risk analysis and prioritisation of audits and inspections, and more particularly could highlight the positive impact of the implementation of the IUU Regulation.

Annex 1: Questionnaire sent to Member States

ORGANISATION

- (1) Please describe the organisation of the MS administration in charge of the management of Catch Certificates.
- (2) How many employees are in charge of the catch certificates management? What are their tasks and responsibilities?
- (3) Please describe the architecture of the chain of command, and the chain of feedback.
- (4) Are supervision procedures in place? Please explain the procedures.

DIGITALISATION

- (5) Is the catch certificates management done manually or does the Control Authority have IT tools set up to support implementation of the IUU Regulation?
- (6) Please describe the IT system used by the MS for the catch certificates process.
- (7) What are the national legal texts backing up the use of the IT tools for Catch Certificates verification? Please, can you provide us the link or a copy of these texts.
- (8) How is the catch certification IT Tool integrated with other control systems? Please describe.
- (9) How helpful is your IT Tool for risk management? What are the risk criteria taken into account? Please describe. Does the IT tool provide automatic alerts? Give some examples please. Does the IT tool provide automatic checks and verification?
- (10) Do you have procedures/manuals? Please, can you share a copy of this manual with us?
- (11) Do you carry out an administrative control of 100% of the catch certificates and processing statements? If not, how is the sampling done? Are these controls done differently based on the means of transport by which fish consignments enter the country?
- (12) Is it the operators who enter the data into your IT system or does the data come from paper documents and entered by the administration? How was the acceptance of the digitalisation by the importers and stakeholders? Please describe.
- (13) What training, and guidelines regarding the catch certification management have been developed and for whom (officials, importers, etc.)?
- (14) Is your IT tool used for cooperation and/or exchange of information with other entities (custom, other MS etc...)? Please explain.

LINKAGE WITH THE EU CATCH SYSTEM

- (15) Does the competent authority use the EU CATCH system?
- (16) Is the national IT tool linked with the EU CATCH system? If yes, how? If not, will it be in the future? Please explain.

- (17) What kind of changes did you make to your IT system to link it with the EU CATCH system? Please describe.
- (18) What are the advantages and eventual drawbacks of using the EU CATCH system? Please explain.

POTENTIAL IMPROVEMENTS

- (19) How to ensure quality management for the catch certification management? Please explain.
- (20) How to ensure a level playing field for the processing of the Catch Certificates between the different operators and the different Member states? Please explain.
- (21) Please explain what you think could be the further improvements to increase the reliability and effectiveness of the management of catch certificates?
- (22) Do you get enough assistance from the European Commission to develop the IT tool and link it to the CATCH system? Could you give some examples? What could be done to improve the assistance?

Brussels **Beijing** **Berlin** **London** **Warsaw** **Madrid** **Los Angeles** **Luxembourg**

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