



Ms Rebecca Hubbard
Our Fish

Date: 6 September 2019
Ref: 19-25081-000129

In regards to your request of access to information relating to Danish fisheries control and landings in Denmark and estimated discards

Dear Ms Rebecca Hubbard,

Thank you for your request regarding access to information of 8 July 2019 relating to fisheries control, landings and estimated discards in Denmark.

Your request was forwarded to the Danish Fisheries Agency 10 July 2019. On 16 July 2019, the Danish Fisheries Agency wrote to confirm that we had received your request and that we expected to be able to answer it by mid-August 2019.

On 23 August 2019, the Agency wrote you to inform you that we would not be able to process your request within the given deadline as there were some aspects we needed to process further, but that we expected to be able to give you an answer by the beginning of September.

Decision

The Danish Fisheries Agency hereby grants your partial access to the requested materials.

The Danish Fisheries Agency understands the second and fifth point of your request as concerning two types of observers: Fishery inspectors from the Danish Fisheries Agency and technical observers. The Danish Fisheries Agency does not have observers on board fishing vessels.

As far as technical observers, you're referred to the National Institute of Aquatic Resources, DTU Aqua, cf. section 4 paragraph 5 in the Danish consolidation act no 980 of 16 August 2017. The Fisheries Agency, however, has obtained an answer to your questions from DTU Aqua, and a copy of their answer is enclosed in this letter.

In regard to your first, third, sixth, seventh eighth and ninth point, you will find the answers to your questions below. It is the opinion of the Danish Fisheries Agency, that the request to receive "*all reports, letters, notices, correspondence or communications involving staff of Miljø- og Fødevareministeriet and Fiskeristyrelsen*" is formulated too broadly for the Agency to be able to process it properly. We encourage you to be more specific, in so far as you do not find the answer below sufficient.

Please note, that a lot of the information you request already is available on the [website](#) of the Danish Fisheries Agency including inter alia statistics regarding [landings](#), as well as the annual [reports](#) on inspection of commercial and recreational fisheries.

Please also note, that the annual report for the year 2018 has not yet been published. When the report is published, it will be available on our website.

<p>Point 1 <i>“How many at sea control inspections of Danish fishing vessels were carried out by the Danish authorities in the years 2016, 2017 and 2018 in the Northeast Atlantic (incl. Kattegat and Skagerrak) and the Baltic sea and what percentage of the total fishing trips per year was covered by these inspections in the respective sea areas ...”.</i></p>	<p>For the North sea, (incl. Kattegat and Skagerrak), the total number of fishing trips carried out by Danish fishing vessels were 44.266 in 2016, 40.627 in 2017 and 42.287 in 2018.</p> <p>In the same years, the Danish Fisheries Agency conducted:</p> <ul style="list-style-type: none"> • 203 at sea inspections in 2016, equivalent to 0.5% of the number of fishing trips, • 200 in 2017, equivalent to 0.5%, and • 213 in 2018, equivalent to 0.5%. <p>For the Baltic Sea, the total number of fishing trips by Danish fishing vessels were 23.752 in 2016, 20.170 in 2017 and 19.576 in 2018.</p> <p>In the same years, the Danish Fisheries Agency conducted 236 at sea inspections in 2016, equivalent to 1.0% of the number of fishing trips, 237 in 2017, equivalent to 1.2%, and 221 in 2018, equivalent to 1.1%.</p> <p>Please see the table and its legend in the attached document.</p>
<p>Point 3 <i>“What is the percentage of control of the total landings in all Danish ports during the years 2016, 2017, and 2018?”</i></p>	<p>The total number of fishing trips by Danish fishing vessels were 68.018 in 2016, 60.797 in 2017 and 61.863 in 2018.</p> <p>In the same years, the Danish fisheries Agency conducted:</p> <ul style="list-style-type: none"> • 2.522 inspections in all Danish ports in 2016, equivalent to 3,7% of all landings, • 2.388 inspections in all Danish ports in 2017, equivalent to 3,9% of all landings, and • 2.424 inspections in all Danish ports in 2018, equivalent to 3,9% of all landings. <p>Please see the table and its legend in the attached document.</p>
<p>Point 4 <i>“Have the Danish authorities increased at sea monitoring following the introduction of the landing obligation? If so, by what percent compared to before the introduction of the landing obligation?”</i></p>	<p>You are referred to page 6 in the annual report on inspection of commercial and recreational fisheries 2017 (link below):</p> <p><i>“In 2017 the number of landings of fish amounted to 67,024 - a decrease of 9 % compared to 2016. The quantity of fish landed in 2017 was approx. 1,196,124 tons, which is 35 % more than in 2016. The increase is mainly due to larger quantities of landed industrial species. The total amount of industrial species landed by Danish vessels increased by approx. 350.000 tons compared to 2016.</i></p> <p><i>In 2017 3, 269 fishing trips were inspected, which was 103 less than in 2016, equivalent to a decrease of 3 %.</i></p>

	<p>2,725 inspections were performed at landing equivalent to an inspection rate of 4.0%. In 2016, the inspection rate was 3.8%. In 2017, 544 inspections were carried out at sea and there were 637 observations of fishing vessels without boarding of the vessel.</p> <p>...</p> <p>Despite of more inspections related to industrial and pelagic landings in port, the total number of inspections in port decreased by 3 % in 2017. This is due to an increased number of inspections of industrial and pelagic species, which are more time consuming to inspect.</p> <p>...</p> <p>The decline in number of inspected vessels at sea has to be seen in conjunction with a general decrease in the control base. Furthermore, control of compliance with the closed season in the Baltic Sea has been extended and therefor the number of fishing vessels observed and inspected at sea has decreased and individual inspections have become more extensive and time consuming. Unlike previously, the inspectors use more time on sampling of species and size composition in the latest haul from the controlled fishing vessels.</p> <p>...</p> <p>Finally, the decline in number of inspected vessels should also be seen in context with the fact that the total number of landings of fish was reduced by 9 %.”</p> <p>Furthermore, the Danish Fisheries Agency has increased the number of Last Haul inspections as a result of the landing obligation as a supplement to the traditional at sea inspections:</p> <ul style="list-style-type: none"> • In 2015, the Danish Fisheries Agency conducted 26 Last Haul inspections in the North Sea and 103 in the Baltic Sea. • In 2016, the Danish Fisheries Agency conducted 78 Last Haul inspections in the North Sea and 91 in the Baltic Sea. • In 2017, the Danish Fisheries Agency conducted 73 Last Haul inspections in the North Sea and 103 in the Baltic Sea. <p>You are referred to page 14 in the annual report on inspection of commercial and recreational fisheries 2017 (link below).</p> <p>https://fiskeristyrelsen.dk/media/10276/fisheries-inspection-2017.pdf</p>
<p>Point 6 & 7 “Please provide the total landings in Denmark of North</p>	<p>The Danish Fisheries Agency will answer point six and seven of your request together.</p>

<p><i>Sea cod, Eastern Baltic Cod and the Western Baltic Cod for the years of 2016, 2017, 2018.</i></p> <p><i>Please provide any information on the percentage of North Sea cod landed as below the minimum conservation reference size or unwanted catch for these years.</i></p> <p><i>Please provide information of the total amount of landing below the minimum conservation reference point for Eastern Baltic Cod and the Western Baltic Cod] in the years 2016, 2017, 2018”.</i></p>	<p>On our website you can find statistics on the total landings in tonnes of each type of fish in the respective fishing zones (in Danish): https://fiskeristyrelsen.dk/fiskeristatistik/kvotestatistik-og-kvoteudnyttelse/</p> <p>Below you will find a direct link to the total landings of cod in all waters by Danish fishermen (in Danish):</p> <p>in 2016 - http://webfd.fd.dk/stat/kvoter_x/torx16.html</p> <p>in 2017 - http://webfd.fd.dk/stat/kvoter_x/torx17.html</p> <p>and in 2018 - http://webfd.fd.dk/stat/kvoter_x/torx18.html</p> <p>You can create tables with the specific information regarding landings per year and per harbor with the dynamic table through this link (in Danish): https://dwp.fiskeristyrelsen.dk/landingsrapport/landingsrapport_front_matter</p>
<p>Point 8 & 9</p> <p><i>“Please provide any information you have or calculations regarding estimated numbers of [North Sea cod, Eastern Baltic cod and Western Baltic cod] that were discarded by Danish fishing vessels for the years 2016, 2017, 2018.</i></p> <p><i>Please provide information about how these estimates were calculated (based on what sources of information).”</i></p>	<p>The Danish Fisheries Agency will answer point eight and nine of your request together.</p> <p>Attached you’ll find a table with the registered amount of cod from the North Sea, Eastern- and Western Baltic Sea that was discarded Danish and foreign fishing vessels in the years 2016, 2017 and 2018 as well as the total amount landed as registered in the logbooks.</p> <p>Further, you should be able to find the answer to your request can on page 14 in the annual report on inspection of commercial and recreational fisheries 2017 (link below):</p> <p><i>“In 2017 fishing inspection vessels supplemented the traditional inspection at sea with inspection of the catch composition and size distribution of selected species. This kind of inspection has been named "Last Haul” – inspection and is conducted in accordance with guidelines prepared by the EFCA. The purpose was to collect data on the distribution of fish above and below the minimum size. This was part of the risk assessment to be prepared in connection with the ban on discards of the species concerned.</i></p> <p><i>On average, the proportion of cod below the minimum reference size found in connection with Last Haul control was in The Baltic Sea 13.2% and in the North Sea 5.7%. When the fishermen reports in the logbook without prior inspection, the proportion of cod below the minimum is often below 1%.</i></p>

	<p><i>The Danish Fisheries Agency has not found violations of the landing obligation under inspection at sea as it is very difficult to document illegal discard that occur before and after the actual inspection. In 2017, three violations have been found on vessels that had a Last Haul control done at sea and did not have the controlled amount of fish below minimum reference size aboard on a follow-up landing inspection in port.”</i></p> <p>https://fiskeristyrelsen.dk/media/10276/fisheries-inspection-2017.pdf</p>
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Complaints handling guidance

You can appeal the decision of the Danish Fisheries Agency to the Department of the Ministry of Environment and Food of Denmark, cf. section 4 b in the Danish consolidation act no 980 of 16 August 2017.

You can make a complaint about the processing time to the Department of the Ministry of Environment and Food of Denmark.

Your appeal or complaint must be submitted to the Danish Fisheries Agency in writing. Please use the following e-mail: fiskerikontrol@fiskeristyrelsen.dk.

If the Danish Fisheries Agency does not agree with the appeal or complaint, the Agency will send it to the Ministry along with our comments. Decisions by the Ministry are final and cannot be appealed to other administrative authorities.

There is no deadline for appeals or complaints regarding decisions of freedom of information made by the Danish Fisheries Agency.

Do you wish for others to submit an appeal or complaint on your behalf?

If you wish for others to act on your behalf, we urge you to fill out a proxy form that can be found on our [website](#).

Do you have any questions?

If you have any questions, you are welcome to contact us by phone or E-mail: Phone +45 72 18 56 00. E-mail: mail@fiskeristyrelsen.dk

Sincerely,

Christian L. N. Christensen
Head of Section, LL.M.
Danish Fisheries Agency, Fisheries Control Unit