

From commons to companies

**How Germany handed over its
fishing sector to Europe's biggest
fishing company**

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1 Introduction

1.1 From Commons to companies - making the case

The ocean and its fisheries are good and rare examples for what can be called commons of natural resources. While most land areas are either privately or publicly owned, the sea belongs to nobody. Human use of the ocean – such as fishing, is managed only in the waters close to national territory, in the form of Exclusive Economic Zones (EEZs). Beyond the EEZs are international waters – the high seas - not used or managed exclusively by any nation.

Regarding fisheries, the member states of the European Union have merged their maritime economic zones under the Common Fisheries Policy, in order to share their use. The stated aim of the EU Common Fisheries Policy is to ensure ecologically, socially and economically sustainable fisheries in Europe's shared fishing areas. Economic and social sustainability requires productive fish populations and healthy ecosystems. When fish populations decline, fishing must be reduced to not jeopardize its own basis. However, against the background of short-term social interests, it is not uncommon for fishing to be continued more generously than the principle of ecological sustainability, and therefore also economic and social sustainability, requires. As a result, the sustainability of fisheries is jeopardized.

The general idea of keeping fish populations at a productive level in order to continue fishing is not especially challenging. Therefore, one can wonder which mechanisms cause fishing companies and particularly small-scale fishermen, who rely on the continuation of their business, to ignore this relatively simple principle.

Big fishing companies often portray themselves as mere quota receivers who must surrender to international policies. However we suggest that they actually play a strong role in the shaping of quota setting and management. With a strong concentration of quota shares, a few large companies are able to use political influence to push for fishing catches beyond the sustainable limit, while small-scale fishers are left to worry about their very existence. With the industrialization and internationalization of fisheries, it is increasingly unlikely that the interests of small and large fishing companies remain the same.

The purpose of this report is to illustrate the historical evolution of access to the commons of fisheries in Germany, and how big businesses have exploited this situation. Specifically, we look at the current implementation of the Common Fisheries Policy and quota allocation, and the use of subsidies, focusing on one of the major fishing businesses and its role within the German fisheries sector.

The case of the Parlevliet & Van der Plas Group (P&P in this report) in Germany, with its aggressive expansion strategy, market dominance and growing political influence is a case study in how big fishing companies have gotten into a position where increasing their profits, be it from various forms of subsidies or from quotas, goes beyond the point of maximum sustainable yield.

After briefly going into the German quota system in chapter 2, chapter 3 gives an overview over Parlevliet and Van der Plas as a company.

Chapter 4 considers various aspects that are of importance to understand how companies such as

the P&P group gained dominance. Section 4.1 investigates how access to fishing quotas is distributed, why one company receives the lion's share, and why too few people know about it. Section 4.2 looks at how this same highly profitable company also receives millions of subsidies every year. Section 4.3 examines the political influence of the company.

1.2 Main finds

- The lions share of revenues from German fishing resources do not go to the vast majority of the fishermen but to one company alone – Parlevliet & Van der Plas
 - P&P effectively has a monopoly with regards to the German large pelagic high seas fisheries
 - P&P is estimated to take more than 40% of the complete revenues from fish landed by the German fleet
 - For 2017, Parlevliet is estimated to have effectively fished 100% of the German quota for both mackerel and blue whiting and 64% of the German herring quota
 - P&P took advantage of the privatization of the fishing fleet of the former German Democratic Republic to concentrate quotas and dramatically increase market control
- P&P takes advantage of mechanisms meant to provide adequate participation in decision-making processes such as the special role of producer organizations
 - The only PO (producer organization) that manages to constantly arrange meetings with high ranked politicians and organize prestigious lobbying events consists completely of subsidiaries of P&P and another Seafood giant, Samherji
- P&P influences the political decision making process for its own benefit
 - P&P gained an estimated additional €2.6 million in revenues in Germany in 2017 just from excess quotas agreed to by the EU ministers above the proposed sustainable total allowable catches (TAC) for herring, mackerel and cod
 - The total benefit from Fisheries Partnership Agreements between the EU and Mauretania for the German fleet of pelagic freezer trawlers operated by Parlevliet is €21.8 million between 2006 and 2018
- The high degree of integration and market share of the P&P group in Germany allows for an inflow of public resources through various forms of direct and indirect subsidies
 - The fleet of P&P in Germany received over €17 million in subsidies under the Financial Instrument for Fisheries Guidance (FIFG) between 1994 and 2006
 - P&P received over €20 million in subsidies for its processing factory Euro-Baltic. P&P representatives claim that these subsidies benefit local fishermen, yet the plant clearly operates almost entirely by processing herring from UK waters.
 - P&P saves between €5,9 and €23,1 million per year in the operation of its German fleet,

from indirect subsidies through fuel exemptions

2 The German quota system

2.1 The German Quota System

Germany was relatively early in adopting its fishing management system as an individual quota system (IQ). After the implementation of the CFP, quotas were attached to the vessels and thus their respective owners or producer organizations (POs).¹

The principles of fisheries management in Germany are written down in the *Seefischereigesetz* (*Ocean Fisheries Law*) from 1984.² Here, it is stated that economic factors (efficiency and sufficient market supply) as well as social factors (previous employment) form the basis for the allocation of quota shares in Germany. In consequence, the government chose a 'grandfathering' system for the allocation of quota. Like the EU itself, Germany distributes the national share to fishers based on a reference period of the late 70s. Fishing licenses were only given to fishers who owned one or more vessels. The law specifically states that vessels receiving a quota share had to be employed in the fishery during 1986/1987. The Western German system of quota allocation was extended to Eastern Germany in 1990.³

Beyond the *Seefischereigesetz*, more practical regulations are issued by the body responsible, the Federal Office for Agriculture and Food (Bundesanstalt für Landwirtschaft und Ernährung (BLE)) in annual announcements about the German Fishery.

In order to increase the quota share, a fisher has to buy a vessel with attached quota. This quota share can be used with a different vessel of the same owner, but the purchased vessel must stay active. In 2011 the system of individual quota attached to the vessel was opened for one year only, to allow the scrapping of old vessels. In 2014 rules were set up to allow the reallocation of quota from one or more licensed vessels to a new vessel.

It should be noted, that there were no payments attached to the initial allocation of quota shares. After receiving quota shares, however, they could be passed on to others, by selling the vessels the quotas were attached to. It is evident, that in this system the value of a fishing vessel is dependent on the attached quota. Vessel buyers are de facto buying and paying for quota shares. In conclusion, the German system of individual quota attached to fishing vessels does include the option to buy and sell quota, even though a system of transferable quota shares has been rejected by the German government, to this day. The difference between a system of individual transferable quota and the German system of individual quota lies with the structural objective to guarantee sufficient capacities to make use of the acquired quota share through buying vessels.

In addition to the individual quota system, quota shares are also allocated collectively to producer organizations (POs). POs can distribute the quota among their members. PO members can also swap quota among themselves, but not sell them.

1 Katharina Jantzen et al., "Individual Vessel Quotas in Germany and Denmark: A Fair Distribution Process?," in *Quota Swapping, Relative Stability, and Transparency* (Marine Policy, 2015).

2 Bundesministerium der Justiz und für Verbraucherschutz, "Gesetz Zur Regelung Der Seefischerei Und Zur Durchführung Des Fischereirechts Der Europäischen Union (Seefischereigesetz -SeeFischG)," last modified July 12, 1984, accessed September 19, 2019, <http://www.gesetze-im-internet.de/seefischg/SeeFischG.pdf>.

3 Katharina Jantzen et al., "Individual Vessel Quotas in Germany and Denmark: A Fair Distribution Process?"

Concentration of fishery quotas

The purchase of vessels with a quota in Germany can result in a concentration of a large majority of fishery resources in the hands of a few companies. Even though the main objective of the management system is to balance capacities and resources, the concentration of quota shares can be problematic in social and cultural terms.

The New Economics Foundation (NEF) report “Who gets to fish?” on the allocation of fishing opportunities in EU member states points out that the success of any system of fishing opportunities can only be assessed against a framework of objectives, including (1) good for fishers, (2) good for society, and (3) good process.⁴ Seeing fish populations as a common good, the second and third categories are especially important to analyse regarding quota concentration and social sustainability.

It is clear that fishers are the most important actors of the fishing sector, and their viability and security is of at least equally high importance as benefits for society. However, the security of fishers and their long-term share of fishing opportunities relies heavily on the overall structure of the sector and their own business organization.

Capacities and resources are balanced through the attachment of quota shares to vessels in Germany. Business security is given through continuation of received or acquired quota shares. However, given the high importance of Fisheries Partnership Agreements and the so-called Northern Agreements, it seems questionable that German fishing fleet capacity is in balance with the resource: a big part of pelagic freezer trawler activities take place in West Africa, Norway, Greenland and the Faeroe Island (see section 4.1.2).

The concentration of quotas supports the establishment of big fishing businesses, whilst making entry and access into the fishery difficult or impossible for young fishers. While producer organisations should also pursue the objective to encourage young people to get into the sector, the concentration of quota in the hand of a few businesses and organizations rather shuts them out (see chapter 4.3.3). Accessibility of fishing opportunities is an important objective of the ‘good for fishers’ category, and is therefore contradicted by the concentration of quota in a few hands.

Data on the actual concentration of quotas is not easily accessible. It seems likely that subsidiaries' systems can also be used to conceal the concentration of quotas. The process of attempting to gain access to relevant data from the corresponding register at the Federal Agency for Agriculture and Food (BLE, responsible for national fisheries management) initiated during the research for this report is still ongoing, however various researchers were contacted who have attempted to gain information before and had no success. Potentially, the unwillingness to be transparent about the distribution of quota shares is linked to a high concentration in the hands of few.

So instead of an in-depth analysis of quota distribution and quota concentration processes that would have been possible with more open access to this information, this report uses what little information is available on specific quota distribution to gain insights into fisheries management.

⁴ Richard Kleinjans Griffin Carpenter, “WHO GETS TO FISH? THE ALLOCATION OF FISHING OPPORTUNITIES IN EU MEMBER STATES” (WWW.NEWECONOMICS.ORG, March 2017), WWW.NEWECONOMICS.ORG.

3 Parlevliet & Van der Plas (P&P) – Company Overview

3.1 The Strategy – integration and market dominance

Since its founding in 1949 by Dirk Parlevliet and brothers Dirk and Jan van der Plas as a regional herring trading company, P&P has come a long way.⁵

Parlevliet & Van der Plas has a very aggressive expansion and growth strategy - with four major acquisitions within the last decade, it is now the largest fishing company in Europe and revenue is expected to be above one billion euro. Ten years ago its revenue was less than €300 million.⁶

The acquisitions of renowned Dutch herring processor Ouwehand in 2009, followed by Europe's biggest shrimp supplier and processor Heiplog in 2014, were milestones in this process.

A press release from 2009 contains a statement that summarized P&P's aims since then: "We want to control the entire chain: from catching and processing fish to selling it to the consumer market."⁷

In 2018 P&P acquired German salmon producer and seafood company Deutsche See. The website Salmonbusiness describes this as "a logical next step in the company's vertical integration strategy."⁸

This tendency towards vertical integration is accompanied by a push for horizontal dominance - the recent acquisition of Deutsche See is a good example of their preference for acquisitions of companies that dominate a specific segment.

3.2 Overview over subsidiaries

Parlevliet lists a number of subsidiaries on their website (information from P&P website, where not specified otherwise⁹). Some recent acquisitions were added to compile the following list.

P&P owns over forty fishing vessels: pelagic, demersal and tuna purse seiners. Among others the group operates the largest fishing vessel in the world, the Annelies-Ilena (145 x 24m), named after two granddaughters of the founders.¹⁰ An extensive list can be found in the Annex.

Fishing companies

- Parlevliet & Van der Plas B.V.- the Netherlands

- Doggerbank Seefischerei GmbH – Germany
 - Full subsidiary of P.P.-Groep Katwijk B.V., founded by P&P in 1986

 - Largest player in German high seas fisheries operating four large freezer trawlers via wholly owned subsidiary companies

5 Parlevliet & van der Plas, "Parlevliet & van Der Plas > About Us > History," accessed September 11, 2019, <https://www.pp-group.nl/about-us/history>.

6 "The Largest Fishing Company in Europe Came Ashore - NRC," last modified April 13, 2018, accessed July 17, 2019, <https://www.nrc.nl/nieuws/2018/04/13/het-grootste-visserijbedrijf-van-europa-groeide-aan-wal-a1599401>.

7 Lieneke Schuitemaker, "Deutsche See Is Added Value for Parlevliet & Van Der Plas," last modified March 18, 2018, accessed July 17, 2019, <https://salmonbusiness.com/deutsche-see-is-added-value-for-parlevliet-van-der-plas/>.

8 Ibid.

9 "Parlevliet & van Der Plas > Partnerships," accessed July 17, 2019, <https://www.pp-group.nl/partnerships>.

10 Lieneke Schuitemaker, "Deutsche See Is Added Value for Parlevliet & Van Der Plas".

- Revenues of €47 million in 2017 ¹¹
- Revenues higher if taking into account the revenues of the subsidiaries (in 2015 it was €35 million for the company and €106 million for the group, revenue for 2017 is not available) ^{12,13}
- Managing directors: Diederik Parlevliet and Dr. Uwe Richter
- Mecklenburger Hochseefischerei GmbH – Germany
 - Full subsidiary of P&P (via Rederij Samenwerking I B.V.) founded by P&P in 1998
 - Large high seas fisheries company operating one large freezer trawler
 - Revenues of €123 million in 2015 and €82 million in 2016 (2017 not available)¹⁴
 - Managing directors: Diederik Parlevliet, Dirk Jan Parlevliet and Dr. Uwe Richter

Fish processing and trading companies

- German Seafrozen Fish- Germany
 - Marketing of Parlevliet & Van der Plas' groundfish product range
 - Full subsidiary of P&P founded by P&P in 1999
 - Revenues of €72 million in 2017 ¹⁵
 - Managing directors: Dirk Jan Parlevliet, Dr. Uwe Richter and Anton van der Plas
- Ouwehand visverwerking - the Netherlands
- Euro-Baltic Fisch Verarbeitings GmbH – Germany
 - 100% owned by Parlevliet & van der Plas B.V. and integrated into P.P.-Groep Katwijk B.V.
 - Revenues of €61 million in 2017 (€60 million in 2016) ¹⁶
- Heiploeg International - the Netherlands

11 Doggerbank Seefischerei GmbH, "Doggerbank Seefischerei GmbH Bremerhaven Jahresabschluss Zum Geschäftsjahr Vom 01.01.2015 Bis Zum 31.12.2015," March 27, 2019, <https://www.unternehmensregister.de>.

12 Euro-Baltic Fischverarbeitings GmbH, "Euro-Baltic Fischverarbeitings GmbH Sassnitz Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017," March 25, 2019, <https://www.unternehmensregister.de>.

13 Doggerbank Seefischerei GmbH, "Doggerbank Seefischerei GmbH Bremerhaven Konzernabschluss Zum Geschäftsjahr Vom 01.01.2015 Bis Zum 31.12.2015," May 4, 2016, <https://www.unternehmensregister.de>.

14 Mecklenburger Hochseefischerei GmbH, "Mecklenburger Hochseefischerei GmbH Sassnitz Konzernabschluss Zum Geschäftsjahr Vom 01.01.2016 Bis Zum 31.12.2016," May 24, 2017, <https://www.unternehmensregister.de>.

15 German Seafrozen Fish Handelsgesellschaft mbH, "German Seafrozen Fish Handelsgesellschaft MbH Bremerhaven Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017," March 25, 2019, <https://www.unternehmensregister.de>.

16 Euro-Baltic Fischverarbeitings GmbH, "Euro-Baltic Fischverarbeitings GmbH Sassnitz Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017."

- Europe’s biggest shrimp supplier and processor Heiplog
- Turnover close to €300 million/year¹⁷
- Owns a 40-strong fleet in Suriname and Guyana¹⁸
- Acquisition in 2014¹⁹
- Deutsche See Holding GmbH ²⁰
 - Largest German seafood processor and trader with revenues of over €400 million (a year before the acquisition)²¹
 - Acquisition (100%) end of 2018

Joined ownership companies

- UK Fisheries Ltd - United Kingdom
 - Owned 50-50 by Samherji HF in Iceland and Parlevliet & Van der Plas
 - Turnover of GBP 71 million in 2017 ²²
- Euronor – France
 - Parlevliet owns 50% of Euronor’s shares
 - Owns fleet of large trawlers that operates on the French quotas in the north of North Sea, in West Scotland, in Faeroe Island Waters, in Norwegian Sea and in Spitsbergen waters²³
- Compagnie des peches, Saint-Malo- France
 - 14 vessels catch around 65,000 metric tonnes of tuna a year²⁴
 - Majority stake bought in 2017
- Pesquera Ancora – Spain
 - Pesquera Ancora owns cod quotas in the Barents Sea and off the coast of Canada, which in 2010 allows harvesting of approx 3,300 MT of fish. The company harvests the

17 “Heiploeg - Some Facts and Figures,” accessed September 11, 2019, <https://www.heiploegroup.com/en-us/company/some-facts-and-figures>.

18 “Dutch Seafood Giant P&P Saw 13% Sales Growth in 2017,” *Undercurrent News*, last modified February 2, 2019, accessed September 11, 2019, <https://www.undercurrentnews.com/2019/02/02/dutch-seafood-giant-pp-saw-20-sales-growth-in-2017/>.

19 Lieneke Schuitemaker, “Deutsche See Is Added Value for Parlevliet & Van Der Plas”.

20 “The Largest Fishing Company in Europe Came Ashore - NRC.”

21 Birger Nicolai, “Deutsche See an Niederländische Gruppe Parlevliet & Van Der Plas Verkauft,” *DIE WELT*, February 13, 2018, accessed September 11, 2019, <https://www.welt.de/wirtschaft/article173519896/Deutsche-See-an-niederlaendische-Gruppe-Parlevliet-Van-der-Plas-verkauft.html>.

22 UK FISHERIES LIMITED, “UK FISHERIES LIMITED - Filing History (Free Information from Companies House),” last modified December 31, 2017, accessed September 12, 2019, <https://beta.companieshouse.gov.uk/company/05219340/filing-history>.

23 Fish Information and Services, “FIS - Suppliers - Company Details - EURONOR | Comptoir Des Pêches d’Europe Du Nord,” accessed September 11, 2019,

https://www.fis.com/fis/companies/details.asp?l=e&filterby=companies&=&country_id=&page=1&company_id=155821&submenu=info.

24 “Dutch Seafood Giant P&P Saw 13% Sales Growth in 2017.”

fish with its own trawlers, and employs a total of 52 people.²⁵

- Owned by Parlevliet & Van der Plas B.V. and UK Fisheries Ltd, which again is partly owned by P&P
- The revenue for 2009 was €38 million
- Dadas Groep²⁶
 - Dadas Groep has fishing boats and focuses on cutter fishing, operating its own processing and freezing business in Urk²⁷
 - P&P acquired majority shares in end of 2018, turnover unknown
- Profish
 - Seafood processor with revenues of over €100 million/year²⁸
 - Strong position in Dutch and German retail sector
 - P&P acquired majority shares in end of 2018

3.3 The Parlevliet & Van der Plas Group in Germany

3.3.1 History of P&P's involvement in Germany

In 1986 P&P moved into demersal fishing and founded a subsidiary company in Germany: Doggerbank Seefischerei in Bremerhaven.²⁹

Germany turned out to be an attractive market for P&P. In 1998, the company added Mecklenburger Hochseefischerei (MHF), located in Rostock, to its portfolio.

With their combined fleets, Doggerbank and Mecklenburger Hochseefischerei operate five out of a total seven vessels in the German high seas fishing fleet.

The following year P&P founded German Seafood Fish (GSF), which is responsible for the worldwide marketing of Parlevliet & Van der Plas' groundfish product range.

Parlevliet & Van der Plas made one of the largest purchases in its history in 2003, with the commission of one of the most technologically advanced fish processing plants in the world: Euro-Baltic Fisch Verarbeitungs GmbH in Rügen, Germany. Euro-Baltic is one of the largest fish-processing companies in Europe, annually processing 50,000 tonnes of herring.³⁰

The latest German acquisition took place only months ago, when P&P took over Deutsche See, Germany's largest fish processing company. "We are very proud of this acquisition," says current

25 Fish Information & Services, "FIS - Suppliers - Company Details - Pesquera Ancora," accessed September 11, 2019, https://www.fis.com/fis/companies/details.asp?l=e&filterby=companies&=&country_id=&page=1&company_id=155991.

26 Parlevliet, "Parlevliet & van Der Plas > Home," last modified June 2017, accessed July 17, 2019, <https://www.pp-group.nl/Portals/4/MVO-10.pdf>.

27 Ibid.

28 "fischmagazin.de - Holland: P&P und Profish gründen Joint-Venture," accessed September 11, 2019, <https://www.fischmagazin.de/newsartikel-seriennummer-5205-Holland+PP+und+Profish+gruenden+JointVenture.htm>.

29 Parlevliet & van der Plas, "Parlevliet & van Der Plas > About Us > History."

30 "Fischmagazin.de - Euro-Baltic Fischverarbeitungs GmbH," accessed August 22, 2019, <https://www.fischmagazin.de/detail-seriennummer-2926-EuroBaltic+Fischverarbeitungs+GmbH.htm>.

CEO Diek Parlevliet, son of founder Dirk Parlevliet. “Deutsche See is a healthy company with a turnover of 400 million and 1700 employees. All together, we now have 7700 employees worldwide.”³¹

Parlevliet is also heavily involved in the German PO "Seefrostvertrieb GmbH": nine of its ten members are owned 100% by the Dutch giant. The other one is the only other player involved in the German high seas fleet, the Deutsche Fischunion, which in turn is owned by the Icelandic company Samherji HF.

3.3.2 The fleet of Parlevliet & Van der Plas in Germany

The P&P fleet in Germany is summarized in the following table.

Name	call letters	loading capacity (tons)	Crew	Power (kW)	Trawler type	Shipping company	mother company	group
Annie Hillina	ROS 17	1300	27	2863	pelagic	Ostbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der P
Helen Mary	ROS 785	4000	46	5299	pelagic	Ostbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der P
Maartje Theadora	ROS 171	6000	50	8640	pelagic	Westbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der P
Gerda Maria	ROS 786	650	26	3000	demersal	Nordbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der P
Mark	ROS 777	1200	34	4000	demersal	Mecklenburger Hochseefischerei GmbH		Parlevliet & Van der P

For the calculation of savings by the fleet due to indirect subsidies, the movement of the fleet has been analyzed. The corresponding table can be reviewed in the Annex.

3.3.3 Overview over German subsidiaries of Parlavliet & Van der Plas

From various annual company reports, information on the catch amounts of specific vessels for specific years could be gathered. It is unclear why the company structure is as it is, with each vessel apparently being operated by one specific subsidiary. The company reports of the various subsidiaries of P&P in Germany are very similar. And they all stop including the catch amounts at the same time, in 2013, shortly after having been the focus of much media. In 2012 one of the vessels had been the target of Greenpeace and in 2012-2013 it had been in the press due to a court case regarding illegal high-grading.^{32 33}

DEUTSCHE SEE Holding GmbH

The Deutsche See Holding GmbH is a fisheries processing company with 1800 employees.

"It owns 20 distribution branches across Germany as well as two manufacturing plants in Bremerhaven. One of its biggest client is German fast food chain Nordsee, which sources about 90 percent of its products from Deutsche See."³⁴

31 Lieneke Schuitemaker, “Deutsche See Is Added Value for Parlevliet & Van Der Plas”.

32 Fischmagazin, “fischmagazin.de - Bremerhaven: Greenpeace behindert Fangschiff ‘Jan Maria,’” last modified January 4, 2012, accessed September 16, 2019, <https://www.fischmagazin.de/newsartikel-seriennummer-1902-Bremerhaven+Greenpeace+behindert+Fangschiff+Jan+Maria.htm>.

33 Fischmagazin, “fischmagazin.de - ‘Jan Maria’: Freispruch für Doggerbank vom Vorwurf des illegalen ‘Highgradings,’” last modified November 7, 2013, accessed September 16, 2019, <https://www.fischmagazin.de/newsartikel-seriennummer-2952.htm>.

34 Global Mediator, “Company Profile: Deutsche See,” *IntraFish | The Leader in Seafood News, Prices and Market Analysis*, last modified October 1, 2018, accessed July 25, 2019, <https://www.intrafish.com/news/1586165/company-profile-deutsche-see>.

As a processor Deutsche See does not have its own fleet.³⁵

Profits after Tax: €6.088.498 in 2015/2016 and €5.996.596 in 2016/2017

In 2016/2017 "Deutsche See" has made investments of €7,6 million into immaterial values and infrastructure. This includes €1,5 million for the acquisition and restructuring of the building "Halle X" at Maifischstraße 2-6, Bremerhaven. The facility will be used as dry storage, so that external storage will not be needed.³⁶

- Subsidiary: Deutsche See GmbH
The company report is integrated into that of the Holding company.
- Subsidiary: SHG Seefisch Handelsgesellschaft mbH, Bremerhaven (100%)
- Subsidiary: Bremerhavener Eiswerk GmbH, Bremerhaven (37,5%)
- Subsidiary: City farming GmbH, Hamburg (100%), 20 employees, in 2017 the company reported losses of roughly €150 000.
- Subsidiary: Taste of Tokyo A7S, Greve, Denmark (100%)
Sushi production in Denmark that has been in financial difficulties and been taken over by Deutsche See bit by bit.
- Subsidiary: City Farming Nordic ApS, Greve, Denmark (100%)

Mecklenburger Hochseefischerei GmbH – Germany

200 employees.

Profits: 2017: €1.209.300,20 (2016 - €796.180.73)

Fleet: The vessel "Mark" is said to be the most modern unit of the German high seas fleet. 90,66m long and 16,30m wide it can carry 1274 tonnes.³⁷

- Subsidiary: German Seafood Fish
"German Seafood Fish is part of the MHF Mecklenburger Hochseefischerei, which is 100% owned by the family business Parlevliet & van der Plas b.v. in the Netherlands (P&P)."³⁸
- Subsidiary: Euro Frost GmbH, Bremerhaven
- Subsidiary: Euro-Baltic Fisch Verarbeitungs GmbH – Germany
"65 % of the pelagic landings by the German high seas fleet are from British fisheries zones, in case of the herring even 100%. The same goes for one of the largest fish processing plants in Europe, the Euro-baltic fish processing company. Here 86% of the processed fish

35 "FAQ: Häufig gestellte Fragen," *Deutsche See*, accessed July 18, 2019, www.deutschesee.de/ueberuns/marken/.

36 DEUTSCHE SEE Holding GmbH, "DEUTSCHE SEE Holding GmbH Bremerhaven Jahresabschluss Zum 30.09.2017," September 30, 2017, <https://www.unternehmensregister.de>.

37 DVV Media Group GmbH, "Hochseetrawler „Mark“ überzeugt Eigner," *THB*, last modified July 11, 2017, accessed July 18, 2019, <https://www.thb.info/rubriken/single-view/news/hochseetrawler-mark-ueberzeugt-eigner.html>.

38 German Seafood Fish Handelsgesellschaft mbH, "German Seafood Fish Handelsgesellschaft MbH Bremerhaven Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017."

stem from UK waters."³⁹

"In Denmark Astrid Fiskeri has a long-term and close relationship with the Dutch PP Group (Parlevliet en van der Plas Group). PP Group has a processing plant in Germany. Almost all of Astrid Fiskeri's herring goes to PP Group. The off-take agreements between Astrid Fiskeri and PP Group are renewed annually. They have already been renewed for approximately 10 years. The two companies also swap quotas. PP Group swaps herring for Astrid Fiskeri's horse mackerel, for example."⁴⁰

Doggerbank Seefischerei GmbH – Germany

5 Vessels, Workforce of 330 (265 on board).

- Subsidiary: Ostbank Hochseefischerei GmbH, Sassnitz
 - They used to run Dirk Dirk and have quite some capital, but that changed (capital of €8 million at the beginning of 2009, €1 million at the end of 2009, virtually nothing since 2011). It is unclear why the vessel Annie Hillina, which is operated by the company does not show up in the companies' annual reports except mentioning that after selling Dirk Dirk in October 2009, Annie Hillina was acquired in December 2009.⁴¹
- Subsidiary: Oderbank Hochseefischerei GmbH, Sassnitz
 - In 2012 the ship "Helen Mary" operated by Oderbank caught 29.194 tonnes of fish (2011: 33.984 t) during 9 trips (2011:14 trips).⁴²
 - The revenues were divided as such:⁴³

	31.12.2012	31.12.2011
	€1000	€1000
Frozen fish:		
blue whiting	0,0	9,2
"Haarschwanz"	62,7	401,0
mackerel	6.689,0	7.618,9
herring	10.741,0	5.995,2
scad fish	4.167,0	4.497,6
sardinella	888,6	3.263,3
sardine	2.193,1	1.505,9
other	14,3	232,0
Total	24.755,7	23.524,8

39 Deutscher Hochseefischerei-Verband, "Jahresbericht Des Deutschen Hochseefischerei-Verbandes 2016," last modified March 14, 2017, accessed July 25, 2019, <https://www.deutscher-fischerei-verband.de/downloads/DHV%20Jahresbericht%202016.pdf>.

40 Profundo and Robin Davis Consulting, "Research for PECHCommittee -Seafood Industry Integration in the EU: All 22 Member Stateswith a Coastline," October 2018, [http://www.europarl.europa.eu/RegData/etudes/STUD/2018/629176/IPOL_STU\(2018\)629176_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2018/629176/IPOL_STU(2018)629176_EN.pdf).

41 Ostbank Hochseefischerei GmbH, "Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017," May 4, 2018, <https://www.unternehmensregister.de>.

42 Oderbank Hochseefischerei GmbH, "Jahresabschluss Zum Geschäftsjahr Vom 1.1. Bis Zum 31.12.2012," May 4, 2013, <https://www.unternehmensregister.de>.

43 Ibid.

- Subsidiary: Nordbank Hochseefischerei GmbH, Sassnitz
 - 2011 - “with 1.342 thousand tonnes hallibut is the main fish species of the company”⁴⁴
 - In 2011 the ship “Gerda Maria” operated by Nordbank caught 2.275 tonnes of fish (2010: 2.730 t) during 4 trips (2010: 5 trips).⁴⁵
 - In 2012 the ship “Gerda Maria” operated by Nordbank caught 2.451 tonnes of fish (2011: 2.275 t) during 4 trips.⁴⁶
- Subsidiary: C.C.H. Bösch GmbH, Bremerhaven
- Subsidiary: Warnemünder Hochseefischerei GmbH, Sassnitz
 - The company had no capital in property from 2006 – 2012, then in 2013 acquired property worth €6 million, and in 2014 another worth €2,5 million, in 2015 the company acquired property worth over €22 million and now has property worth about €30 million. This all apparently due to the acquisition of the vessel “Mark”⁴⁷
 - In 2017 the vessel “Mark”, built in 2015 and operated by Warnemünder Hochseefischerei, did four trips and achieved 309 catch days (2016: 303 days).⁴⁸
- Subsidiary: Westbank Hochseefischerei GmbH, Sassnitz
 - In 2012 the ship “Maartje Theadora” operated by Westbank caught 35.040 tonnes of fish (2011: 35.521 tonnes) during 8 trips (2011:8 trips).⁴⁹
 - In addition to the use of the company owned ship the vessel "Nida" was managed (this is also true for 2011)
 - The freezer trawler NIDA belongs to Lithuanian company ATLANTIC HIGH SEA FISHING which according to the Fish Information & Services plattform (FIS)⁵⁰ is owned by P&P and Euro-Baltic
- Subsidiary: Rockall Seefischerei GmbH, Papendorf

Büsumer Krabbenhandel

Owned via subsidiary Heiplog International (Netherlands)

44 Nordbank Hochseefischerei GmbH, “Jahresabschluss Zum Geschäftsjahr Vom 01.01.2011 Bis Zum 31.12.2011,” May 4, 2012, <https://www.unternehmensregister.de>.

45 Ibid.

46 Nordbank Hochseefischerei GmbH, “Jahresabschluss Zum Geschäftsjahr Vom 01.01.2012 Bis Zum 31.12.2012,” May 4, 2013, <https://www.unternehmensregister.de>.

47 Bundesanzeiger Verlag, “Various Yearly Company Reports,” accessed September 20, 2019, <https://www.unternehmensregister.de/ureg/result.html;jsessionid=CD8CCD8EE674DDFDEF38A5EECBE3CE73.web04-1?submission=showDocument&id=23667614>.

48 Warnemünder Hochseefischerei GmbH, “Jahresabschluss Zum Geschäftsjahr Vom 01.01.2017 Bis Zum 31.12.2017 Lagebericht Für Das Geschäftsjahr 2017,” May 4, 2018, <https://www.unternehmensregister.de>.

49 Westbank Hochseefischerei GmbH, “Jahresabschluss Zum Geschäftsjahr Vom 01.01.2012 Bis Zum 31.12.2012,” May 4, 2018, <https://www.unternehmensregister.de>.

50 Fish Information & Services, “FIS - Suppliers - Company Details - UAB, Atlantic High Sea Fishing Company,” accessed September 11, 2019, https://www.fis.com/fis/companies/details.asp?l=e&filterby=companies=&country_id=&page=1&company_id=164776.

Annual turnover of €10 million.⁵¹

Ocean Food GmbH & Co. KG

The company was founded in 1997 by four German captains. They acquired the vessel that was in 1998 to become the Atlantic Peace. It was sold to P&P in 2009 but stayed registered in Germany to Warnemünder Hochsee Fischerei GmbH. Then it was sold overseas in 2014.

51 “Fischmagazin.de - Büsumer Krabbenhandel GmbH,” accessed September 13, 2019, <https://www.fischmagazin.de/detail-seriennummer-11250-firma-Buesumer+Krabbenhandel+GmbH.htm>.

4 Fishing for power - Parlevliet and the German fisheries sector

4.1 Fleet and Quotas

The German fleet consists of a total of 1.329 vessels, landing about 250.000 tonnes of fish, which covers just about 25% of the German consumption of fish.

The majority of the vessels are gillnetters (cutters), a total of 1100, who only contribute to 4% of the total catch.

Other relevant segments are the roundabout 200 North Sea crab boats from 9-27 m length and about 70 bottom trawler from 10-45 length operating in the North Sea and the Baltic Sea.⁵²

	Number	GT	kW
small costal fisheries <12m	1026	2562	26149
VL0010 PG	961	1843	20414
VL1012 PG	65	719	5735
passive gear > 12m	15	1361	3658
VL1218 FPO	1	24	220
VL2440 FPO	1	199	441
VL1218 DFN	7	193	968
VL1824 DFN	1	68	132
VL2440 DFN	5	877	1897
Trawler until 40 m	54	5635	13659
VL0010 DTS	1	4	57
VL1012 DTS	8	112	853
VL1218 DTS	17	548	3109
VL1824 DTS	11	1293	2529
VL2440 DTS	11	3043	5825
VL1218 TM	1	75	219
VL1824 TM	3	279	662
VL2440 TM	2	281	405
Beam Trawls	215	10970	46600
VL0010 TBB	14	41	536
VL1012 TBB	4	53	424
VL1218 TBB	113	3575	22174
VL1824 TBB	72	4489	15825
VL2440 TBB	10	2021	5788
VL40XX TBB	2	791	1853
high seas pelagic >40m	5	20254	20427
VL40XX TM	5	20254	20427
high seas demersal >40m	7	15417	16394
VL40XX DTS	7	15417	16394
Mussels	7	1836	3866
VL1218 DRB	1	53	252
VL2440 DRB	3	581	1381
VL40XX DRB	3	1202	2233
total	1329	58035	130753

Status of the German Fisheries Fleet on 31.12.2018⁵³

52 "Thünen-Institut: Die Deutsche Fischereiflotte: Wenige Große Und Viele Kleine," accessed September 12, 2019, <https://www.thuenen.de/de/thema/fischerei/die-deutsche-fischereiflotte-wenige-grosse-und-viele-kleine/>.

53 BMEL, "Bericht an Die Europäische Kommission Nach Artikel 22 Der Verordnung (EU) Nr. 1380/2013 Über Das Gleichgewicht Zwischen Den Fangkapazitäten Und Den Fangmöglichkeiten Der Deutschen Fischereiflotte Im Jahr 2018," May 27, 2019,

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=2ahUKEwjpmZD13>

The German high seas fishing fleet of large scale vessels only consists of seven vessels, but looking at the distribution of the total landings among the fisheries sectors it is evident that the large high seas fisheries are of essential importance.

Distribution of the total landings of the German fleet among the fisheries sectors ⁵⁴

	large high seas fisheries	Small high seas and costal fisheries	total
landings out of Germany	135644,9	36613,2	172258,1
landings in Germany	21952,4	53616,6	75569,0
total landings	157597,3	90229,8	247827,1
% of total landing	63,6	36,4	100,0
landings in the Netherlands	111655,8	5184,7	116840,5
% of total landing	45,1	2,1	47,1

55

With regards to the catches, 87% of the landed fish is fished under quota management, so the distribution of the quotas is the distribution of the vast majority of the common good of Germanys fish resources.⁵⁶

4.1.1 Non-transparency of quota distribution

When it comes to quota distribution, the lack of transparency is obvious. A team of researchers commissioned to provide a report to the European commission comes to the following conclusion: "No data has been collated with regard to the allocation of quotas. Requests for this information were denied by the German authorities."⁵⁷

For this report, data on quota distribution was requested from the BLE (Federal Office for Agriculture and Food). While months later, the request is still being processed the exchange with the federal office has indicated that an in-depth analysis will be made difficult by a high degree of anonymisation and abstraction in the provided data. Anonymisation of the requested data was justified by the competent authority with the protection of the business secrets of quota holders.

Researchers from the Thünen Institute who are working closely with the Federal Office responded that they had no information with regards to the distribution of quotas.

This extreme lack of transparency is hard to justify. If the producer organizations are not agents of specific companies but truly bodies facilitating the cooperation and representation of a multitude of producers, then the information about the distribution of quotas in between these producer organizations can hardly be regarded as a business secret where publication could endanger specific interests.

One could argue that if this information is treated as a secret it is likely that this is done more to

cvkAhVBZVAKHS71BysQFjAAegQIAxAC&url=https%3A%2F%2Fwww.portal-fischerei.de%2Ffileadmin%2Fredaktion%2Fdokumente%2Ffischerei%2FBund%2FFlottenbericht_2018.pdf&usg=AOvVawOLkXALsTadPiCNFw7bXUVL.

54 Bundesanstalt für Landwirtschaft und Ernährung, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2017," early 2018, https://www.ble.de/DE/Themen/Fischerei/Fischwirtschaft/fischwirtschaft_node.html#doc8982022bodyText1.

55 Bundesanstalt für Landwirtschaft und Ernährung, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2017," early 2018, https://www.ble.de/DE/Themen/Fischerei/Fischwirtschaft/fischwirtschaft_node.html#doc8982022bodyText1.

56 European Commission, "Study On Ownership and Exclusive Rights of Fisheries Means of Production," February 2019, <https://ec.europa.eu>.

57 Ibid.

protect the interests of specific companies, than groups of producers.

4.1.2 The German high seas fleet and Parleviets role

The German high seas fishing fleet of large-scale vessels consists of just seven vessels, five of which are owned by subsidiaries of P&P. The other two are the vessels "Cuxhaven" and "Berlin" owned the "Deutsche Fischfang Union".

Name	call letters	loading capacity (in tons)	power	type	company	mother company	group
Annie Hillina	ROS17	1300	2863	pelagic trawler	Ostbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der
Helen Mary	ROS785	4000	5299	pelagic trawler	Ostbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der
Maartje Theadora	ROS171	6000	8640	pelagic trawler	Westbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der
Gerda Maria	ROS786	650	3000	demersal trawler	Nordbank Hochseefischerei GmbH	Doggerbank	Parlevliet & Van der
Mark	ROS777	1200	4000	demersal trawler	Mecklenburger Hochseefischerei GmbH		Parlevliet & Van der
Cuxhaven	NC100	1100	3600	demersal trawler	Deutsche Fischfang Union GmbH & Co. KG		Samherji HF
Berlin	NC105	1100	3969	demersal trawler	Deutsche Fischfang Union GmbH & Co. KG		Samherji HF

Although the use of the vessels can at times switch from demersal to pelagic fishing, the pelagic high seas fisheries is pretty much in the hands of Doggerbank, which will become more apparent later in this report.

4.1.3 The lions share - an insight into landings and quotas

Only a few sources of information could be found with regards to the quotas of the Parlevliet fishing operations in Germany.

One is from a corporate responsibility report from 2017 that was undertaken together with the company Kutterfisch, a company engaging in small high seas fisheries, and contains information on the quotas of Doggerbank, the company operating all of the vessels of the German high seas fleet that are focused on pelagic species.⁵⁸ The following table compares this information with data on selected species landed by the German fleet in 2017 (in Germany and elsewhere).⁵⁹

fish species	Doggerbank base quota 2016 (t)	Doggerbank base quota 2017 (t)	Doggerbank quota after swaps 2016 (t)	Doggerbank quota after swaps 2017 (t)	Doggerbank Catch 2016 (t)	Doggerbank Catch 2017 (t)	landings German fleet 2017 (t)	Doggerk share of landings (%)
herring	57149	53945	41709	44012	41709	43690	67973	
mackarel	23214	26450	23165	24446	23165	24446	24750	
blue whiting	12402	22994	20025	45523	20025	45523	45523	
cod	2998	3115	3361	3751	3361	3283	53548	
subtotal	95763	106504	88260	117732	88260	116942	191794	

In sum, the landing of the quotas given to Doggerbank with these four species alone (which only accounts for the landings of the pelagic fleet of Parlevliet and Van der Plas) account for €70 million of revenue (27% of the revenue from all landings in 2017). Leaving revenues from mussels and crabs out of the equation, the revenues from these four species' quotas alone arrive at 41,2 % of

58 Doggerbank Seefischerei GmbH Kutterfisch, "Nachhaltigkeitsreport 2016/2017 Der Kutterfisch-Zentrale GmbH Und Doggerbank Seefischerei GmbH," accessed July 25, 2019, http://cuxhaven.kutterfisch.de/downloads/nh_bericht_kutterfisch_doggerbank.pdf.

59 Bundesanstalt für Landwirtschaft und Ernährung, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2017."

Germany's total revenues from fish landings (own calculations based on BLE numbers⁶⁰).

This calculation is backed up by the statements made by the Minister for Food and Agriculture of Mecklenburg – Pommerania, Till Backhaus. In an interview in August 2018 he said: "We (the German fleet) can fish the North Sea herring at a scale of 53,000 tonnes, meaning that 82% of the earnings of the German high seas fisheries are obtained from fishing activities in British waters."⁶¹

Another citation is from an older presentation held by Uwe Richter, executive director of various Parlevliet operations in Germany, such as the Euro Baltic and Mecklenburger Hochseefischerei in 2011.⁶² It includes the following information on Doggerbank quotas:

		2008	2009	2010
Base Quota	pelagic	66893	62627	59471
	demersal	13172	13064	14562
national and international Quota swaps		40	50	52
swapped amount (tons)	pelagic	72835	46375	50983
	demersal	11714	12031	13130
Quota after swaps (tons)	pelagic	78660	66028	75931
	demersal	8957	7669	6638

Adding up Doggerbank's 2017 quotas for herring, mackerel, blue whiting and cod totals a quota of 106,504 tonnes before quota swaps. The increase of the Parlevliet fleet quota over the last eight years from around 75,000 tonnes in 2010 (see table above) to over 106,504 tonnes (as this was only for four species) coincides with an increase from 214,000 tonnes to 256,000 tonnes of the entire German fleet.^{63,64}

Looking at the TAC's that the ministers agreed to in 2017, the average percentage of excess TAC (amount of quota agreed by the European ministers that lies above the scientifically advised TAC) for Germany is about six per cent. A tendency for an increase of excess quota for the species that are of special importance to Germany's P&P fleet could not be determined (see list of excess quotas for Germany in Annex).

The amounts that the P&P fleet can catch additionally due to higher as excess TAC can be estimated regarding specific species based on the catch data. The extra revenue for excess quota from extra catches of herring, mackerel and cod can be estimated to be approximately €2,6 million in 2017. ⁶⁵

^{66 67}

⁶⁰ Ibid.

⁶¹ "Brexite-Folgen - Fish and Chips in Mecklenburg-Vorpommern," *Deutschlandfunk*, last modified August 16, 2018, accessed August 22, 2019, https://www.deutschlandfunk.de/brexit-folgen-fish-and-chips-in-mecklenburg-vorpommern.862.de.html?dram:article_id=425678.

⁶² Uwe Richter, "Stand Und Entwicklung Der Hochseefischerei in Deutschland," July 2011, <https://docplayer.org/24202077-Stand-und-entwicklung-der-hochseefischerei-in-deutschland-dr-ing-uwe-richter.html>.

⁶³ Bundesanstalt für Landwirtschaft und Ernährung, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2010," early 2011, https://www.ble.de/SharedDocs/Downloads/DE/Fischerei/Fischwirtschaft/Anlandestatistik2010.pdf?__blob=publicationFile&v=1.

⁶⁴ Bundesanstalt für Landwirtschaft und Ernährung, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2017."

⁶⁵ Griffin Carpenter, "Landing the Blame: Overfishing in the Northeast Atlantic 2017," *New Economics Foundation*, accessed September 16, 2019, <https://neweconomics.org/2017/04/landing-blame-overfishing-atlantic-2017>.

⁶⁶ Griffin Carpenter, "Landing the Blame: Overfishing in the Baltic Sea 2019," *New Economics Foundation*, accessed September 16, 2019, <https://neweconomics.org/2018/11/landing-the-blame-baltic-2019>.

⁶⁷ BLE, "Die Hochsee- Und Küstenfischerei in Der Bundesrepublik Deutschland Im Jahre 2017 -

fish species	Doggerbank Catch 2017 (t)	landings German fleet 2017 (t)	landings German fleet 2017 (1000€)	€/ton German landings	Doggerbank share of German landings in 2017 (%)	Excess Quota Germany 2017 (tonnes)	Doggerbank Excess TAC catch (tonne)
herring	43690	67973	27796	409	64	2942	18
mackarel	24446	24750	22204	897	99	1998	19
blue whiting	45523	45523	16683	366	100	0	
cod	3283	53548	18453	345	6	2589	1
subtotal	116942	191794	85136				

4.1.4 The history of Parlevliet's quota share

As shown in the section on quotas, the German quotas for high seas fisheries comes from data of historical use. What was the structure of this historical high seas fishing back then, and how did it transform into Parlevliet's pelagic landings, the largest share of earnings by far acquired from German fisheries at the moment?

To trace the development of Parlevliet's quota in detail, and analyse specifically how much the development of the quota share of Parlevliet can be characterised as a process of quota agglomeration by the company, goes beyond the scope of this report.

Whether the development from a larger fleet to a smaller sized fleet happened mostly before 1984, and Parlevliet basically acquired a fleet and quota that had already been agglomerated with regards to fleet size or whether the majority of the quota agglomeration is to be attributed to Parlevliet's activities - this is hard to say.

What is evident however from looking at a number of historical facts is that since its move into Germany, Parlevliet managed to gain control over the fishing rights evolved from the fishing history of the once impressive fleet in Rostock.

In 1983, Council Regulation EEC 170/83 established a formal mode to determine fishing quotas for the member states, considering historic catches.

In 1984 the German quota system was drafted in the "Seefischereigesetz" based on historical fishing data. Since then, an essentially vessel-based system of quota distribution using the principle of relative stability was used.

Detailed reports on historical catch data for the high seas fisheries from Rostock indicate catch data between 130.000 tonnes and 170.000 tonnes per year between 1979 and 1984, mainly by the state owned "VEB Fischkombinat Rostock".⁶⁸

A former fisherman recounts how in comparison to the Western German high seas fleet that was broken up bit by bit over the course of the 70's, the Eastern German fleet was broken down while he was exhaling once.⁶⁹

P&P seized the opportunity deriving both from the changes to a quota-fisheries system and the privatisations due to the change of the German Democratic Republic - an approach that is reminiscent of its recent strategy of aggressive acquisition.

Anlandestatistik 2017," 2018, https://www.ble.de/DE/Themen/Fischerei/Fischwirtschaft/fischwirtschaft_node.html.

68 "Rostocker Hochseefischerei - Beachtenswerte Ereignisse Aus Der Entwicklung Der Rostocker Hochseefischerei," accessed August 23, 2019, <http://www.rostocker-hochseefischerei.de/geschichte/ereignisse.php?id=28>.

69 Ingo Schulze, "Meine Zeit bei der Hochseefischerei," *bruno*, accessed September 13, 2019, <https://ros338ba.wixsite.com/bruno/ueber-uns>.

In 1990 the VEB Fischfang Rostock was privatized and broken up into five companies. At this point it had an operational fleet of 40 vessels with a tonnage of 119,914 tonnes. It could not be verified entirely how it was broken up but apparently into the following companies:

- "Deutsche Fischwirtschafts AG" (dissolved in 2006)
- Ostseefisch GmbH (newly founded)
- Rostocker Fischereihafen GmbH (RFH)
- Rostocker Fischfang- shipping company GmbH (newly founded)

From 1991 – 1992 seven large trawlers of the Eastern German high seas fleet were sold to China or Russia, or scrapped in Spain. All of these vessels came into operation from 1976 to 1982 and will thus have been included in the initial distribution of quotas set by the law of sea fisheries established in 1984. This is likely to have led larger quotas being redistributed among fewer vessels shortly before the privatization of the state owned VEB.

In 1992 - 93 Mecklenburger Hochseefischerei GmbH was founded and privatized by splitting from Rostocker Fischfang shipping company GmbH (60% sold to Islandic company Akureyringa H.F., the rest stayed with the state and the city of Rostock). The company operates 6 freezer trawlers.^{70 71}

A former fisherman describes how the remains of the Eastern German fleet were incorporated into Mecklenburger Hochseefischerei:

“The MHF took over the vessels ROS 337 "Herkules" (former "Ludwig Renn"), ROS 801 "Auriga" (former "Fritz Dettmann"), ROS 802 "Bootes" (former "Heinz Daduna"), ROS 803 "Cetus" (former "Werner Niedermeier"), ROS 804 "Dorado" (former "Albert Glass"), ROS 805 "Eridanus" (former "Manfred Skaun"), ROS 806 "Fornax" (former "Wilhelm Rügheimer") and ROS 807 "Gemini" (former "Otto Wickboldt"). All other vessels were sold or scrapped.”⁷²

In 1998 P&P takes over Mecklenburger Hochseefischerei with 4 vessels.

Before it had already carried out a variety of operations to establish a complex business:

- In 1986 Doggerbank Seefischerei GmbH was founded as 100% subsidiary of Parlevliet in Bremerhaven. Two charter boats under German flag were operated.
- In 1993 Oderbank high seas fisheries GmbH was founded by P&P in Rostock
- In 1995 Nordbank Hochseefischerei GmbH and Ostbank Hochseefischerei GmbH was founded by P&P.

In 1999 Rostocker Hochseefischerei was founded as a 100% subsidiary of Mecklenburger Hochseefischerei.

In 2001 Warnemünder Hochseefischerei was founded by Mecklenburger Hochseefischerei.

Many operations involving acquisitions and redistribution of vessels and quotas in between this system of companies led to the operational system employed by P&P now.

A good overview over the fleet and the respective catches was gained by collating information from

70 “Hochseefischer Welt - Willkommen an Bord,” accessed August 23, 2019, <http://www.hochseefischer-welt.de/rostock.htm>.

71 “Rostocker Hochseefischerei - Beachtenswerte Ereignisse Aus Der Entwicklung Der Rostocker Hochseefischerei.”

72 Ingo Schulze, “Geschichte der Rostocker Fischerei,” *bruno*, accessed September 13, 2019, <https://ros338ba.wixsite.com/bruno/geschichte-der-fischerei>.

different yearly reports and additional sources.

	built	Available Information on catch (in tonnes)										2014	2015
		2006	2007	2008	2009	2010	2011	2012	2013				
Jan Maria (yearly report Doggerbank)		no info	38368	15114	19200	17271	27322	25652	no info	no info	no info		
Dirk Dirk (yearly report Ostbank)		25258	25431	27940	17016	Sold 2009	-	-	-	-	-	-	-
Helen Mary (Oderbank)	1996	no info	no info	no info	no info	no info	33984	29194	less than 2012	-	-	-	-
Gerda Maria (Nordbank yearly report)	1990						2730	2275	2451	more than 2012	smore than 2013		
Mark (Warnemünder Hochseefischerei GmbH)	2015	-	-	-	-	-	-	-	-	-	-	built	no i
Annie Hillina (Ostbank?)	Aquired 2009	no info	no info	no info	no info	no info	no info	no info	no info	no info	no info	no info	no i
Maartje Theadora (Westbank Hochseefischerei GmbH)	2000	no info	no info	no info	no info	no info	35521	35040	less than 2012	no info	no info	no info	no i
Atlant & Peace (Ocean Food GmbH & Co. KG)		no info	no info	no info	no info	no info	no info	no info	no info	no info	sold		
sum of known individual catches in 2012								92337					
Doggerbank fleet (yearly report)		no info	no info	no info	no info	no info	no info	102000		120000		136000	137000
Doggerbank fleet (CSR Report for 4 species)													1

4.2 Subsidies

Subsidies for fisheries can be sorted into two categories, namely direct support and indirect support. Direct support includes payments from the EU and EU member states. Indirect support comprises the reduction of costs for fisheries and partnership programs for fishing rights outside the EU's economic zone.

4.2.1 Direct EU Support

From 1994 to 2006 the EU supported European fisheries through its Financial Instrument for Fisheries Guidance (FIFG). The financial instrument included payments for the permanent withdrawal of vessels, fleet renewal and modernization, investments in aquaculture, the development of coastal waters, development of port facilities and financial support for processing and marketing of fishing products.

Within the lifetime of the instrument the total amount spent was €8.5 billion of which €3.4 billion were paid to vessels. €5.1 billion were distributed to non-vessel recipients.

For vessels

The Parlevliet & Van der Plas group received €17.7 million for building and modernizing their pelagic trawler fleet. The Pelagic Freezer Trawler Association, consisting of Parlevliet & Van der Plas, Cornelis Vrolijk/Jaczon and Willem van der Zwan en Zonen, received €21.2 million in total. €20 million were used as financial support for pelagic freezer trawlers. These payments were co-financed by Germany (83%) and France (17%). In Germany, the vessels owned by the members of the Pelagic Freezer-trawler Association (PFA) received 31.9% of the total amount spent by the country on vessels under the FIFG. The ROS 785 Helen Mary received the highest subsidy for an individual vessel by the EU, about €6.2 million for its construction and another €132.296 for modernization.⁷³

Table 1: Support for Parlevliet en Van der Plas vessels under the FIFG (1994-2006)

Vessel	Member state	Company	Year	Amount (€)	Used for
ROS 170 Annie	Germany	Parlevliet en	1999	1,558,390	Modernisation

73 Petra Spaargaren Jan Willem van Gelder, "Direct and Indirect EU Support for the Members of the Pelagic Freezer-Trawler Association (PFA)," November 28, 2011, <http://www.greenpeace.nl/Global/nederland/report/2011/Direct%20and%20indirect%20EU%20support%20PFA.pdf>.

Hillina		Van der Plas			
H 176 Arctic Warrior	UK	Parlevliet en Van der Plas	1998	3,227	Modernisation
BX 786 Atlantic Peace	Germany	Parlevliet en Van der Plas	1998	565,047	Modernisation
BX 786 Atlantic Peace	Germany	Parlevliet en Van der Plas	1999	137,430	Modernisation
ROS 784 Dirk Dirk (now KL 843 Naeraberg)	Germany	Parlevliet en Van der Plas	1996	2,291,580	Modernisation
ROS 784 Dirk Dirk (now KL 843 Naeraberg)	Germany	Parlevliet en Van der Plas	2002	1,879,680	Modernisation
ROS 786 Gerda Maria**	Germany	Parlevliet en Van der Plas	1997	197,391	Modernisation
ROS 786 Gerda Maria**	Germany	Parlevliet en Van der Plas	1997	21,048	Modernisation
ROS 786 Gerda Maria**	Germany	Parlevliet en Van der Plas	2001	1,207,680	Modernisation
ROS 785 Helen Mary	Germany	Parlevliet en Van der Plas	1994	6,247,357	Construction
ROS 785 Helen Mary	Germany	Parlevliet en Van der Plas	2002	132,296	Modernisation
BX 791 Jan Maria	Germany	Parlevliet en Van der Plas	1999	3,360,110	Modernisation
H 771 Marbella	UK	Parlevliet en Van der Plas	1996	9,038	Modernisation
H 771 Marbella	UK	Parlevliet en Van der Plas	2005	78,221	Modernisation

Non-vessel support

The European Commission and the EU member states did not release full information on non-vessel payments. However, some payments like subsidies for the Euro-Baltic fish processing plant, based in Germany and owned by Parlevliet en Van der Plas, were released.

Beneficiary	Company	Member state	Year	Amount (€)	Used for
Euro-Baltic Fischverarbeitungs GmbH	Parlevliet en Van der Plas	Germany	2002	17,010,000	Investment grant for first stage of Euro-Baltic fish processing center
Euro-Baltic Fischverarbeitungs GmbH	Parlevliet en Van der Plas	Germany	2006	3,829,000	Investment grant for second and third stages of Euro-Baltic fish processing center
Euro-Baltic Fischverarbeitungs GmbH	Parlevliet en Van der Plas	Germany	2006	126,000	Investment grant for fourth stage of Euro-Baltic fish processing center
Total known Parlevliet en Van der Plas non-vessel				20,965,000	

Other reports claim that one-third of the €35 million spent on the expansion until 2007 was funded

by the German government.⁷⁴

The report “Direct and indirect EU support for the members of the Pelagic Freezer-trawler Association” (PFA) from Profundo compared total FIFG payments between 1994 and 2006 to the total catch value in the same period. The results show that the FIFG payments in Germany represent 26% of the total catch value of German vessels, which is far more than in other EU member states.

Country	Total FIFG payments 1994-2006 (€ mln)	Total value of catch 1994-2006 (€ mln)	FIFG payments as % of catch value
France	752.8	10,524.2*	7.2
Germany	360.5	1,380.5	26.1
Ireland	166.5	2,486.8	6.7
Lithuania (2004-2005)	10.8	61.0**	17.7
Netherlands	151.6	4,300.7	3.5
United Kingdom	371.7	8,581.8	4.3
Total	1,813.9	23,467.7	7.7

FIFG payments compared to catch values. * No data for 1994-1998. Estimate based on catch value of 1999 was used for these years

** Only data for 2005 and 2006. Data from these two years is used as an average yearly catch value.

European Fisheries Fund (EFF)

After 2007, the European Fisheries Fund (EFF) replaced the FIFG. From 2007 to 2013 this instrument had a budget of €4.3 billion with up to 75% funding with weak economic development. In contrast to the FIFG, the EFF puts an emphasis on sustainability. With this instrument the EU does not finance vessel construction or modernization, except measures authorized under the “emergency fuel package”, i.e. scrapping one or more vessels and replacing it by a new one, which is smaller and less fuel consuming.⁷⁵

The EFF specifically supports the adoption of sustainable catching methods, improved storage facilities and fish handling as well as measures to increase energy efficiency. Especially financial support for port infrastructure, fish processing and aquaculture has been in the center of criticism of the EFF. Nearly 40% of spent funding was focused on these areas until October 2010, potentially encouraging an increase of production. Also, vessel owners have been supported to overcome short-term economic problems, aggravating the problem of overfishing.

However, Parlevliet en Van der Plas only received €0.73 million until 2010, all authorized by and with co-funding from Germany.⁷⁶

Beneficiary	Company	Member state	Year	Amount (€)	Used for
Doggerbank Seefischerei GmbH	Parlevliet en Van der Plas	Germany	Unknown	80,216	Fishing gear for vessel Jan Maria

74 “Euro-Baltic Fish Processing Centre Expansion,” *Food Processing Technology*, n.d., accessed July 18, 2019, <https://www.foodprocessing-technology.com/projects/fishprocl/>.

75 “Commission Européenne - COMMUNIQUES DE PRESSE - Communiqué de Presse - EU Package to Tackle the Fuel Crisis in the Fisheries Sector,” accessed August 20, 2019, https://europa.eu/rapid/press-release_MEMO-08-415_en.htm?locale=FR.

76 Jan Willem van Gelder, “Direct and Indirect EU Support for the Members of the Pelagic Freezer-Trawler Association (PFA).”

Westbank Hochseefischerei GmbH	Parlevliet en Van der Plas	Germany	Unknown	646,383	Pilot project, SkySails system vessel Maartje Theodora
Total Parlevliet en Van der Plas				726,599	

State aid - direct support from Germany

In principal, state aid schemes are handled independently by the member states, but according to guidelines created by the European Commission to ensure compliance with the EFF. There is no transparency about German state aid programs for fisheries, and to investigate it further goes beyond the scope of this report.

4.2.2 Indirect Support

With so-called **Fisheries Partnership Agreements (FPA)**, the European Union gives financial and technical support to third countries in exchange for fishing rights. The most important FPA's include agreements with Mauritania and Morocco. The first agreement with Mauritania was made in 1987 and it has been renewed ever since. In a Profundo report, the authors calculated that, based on the value and quota of the species covered by the agreement, the economic value of fish caught by pelagic freezer trawlers is 49% of the total economic value under the FPA.⁷⁷ Between 2006 and 2012 EU contributions were €477 million, between 2012 and 2014 it was €181.5 million, and between 2015 and 2018 it was €246.5 million. Since 2006 the EU contributed €905 million to the fisheries partnership agreement with Mauretania. The quota of German pelagic freezers were published by the EU. It has since increased from 4.6% to 5.4%.⁷⁸

	2006-2012		2012-2014		2015-2019	
	amount (tonnes)	percentage	amount (tonnes)	percentage	amount (tonnes)	percentage
Germany	20000	4,61%	15396	5,40%	12560	5,40%
France	10000	2,30%	3205	1,12%	2615	1,12%
Latvia	73500	16,94%	66087	23,19%	53913	23,19%
Lithuania	120500	27,76%	70658	24,79%	57642	24,79%
Netherlands	190000	43,78%	76727	26,92%	62592	26,92%
Poland	10000	2,30%	32008	11,23%	26112	11,23%
UK	10000	2,30%	10457	3,67%	8531	3,67%
Ireland	0	0,00%	10462	3,67%	8535	3,67%
total	434000	100,00%	285000	100,00 %	232500	100,00%

Division of

Fishing access to Mauretanian waters based on the fisheries agreement between Mauretania and the EU

A document prepared by the CEO of Doggerbank, Uwe Richter, shows that for the German large high seas fleet this is a relevant factor. Between 2007 and 2011 the percentage of pelagic fish fished in

⁷⁷ Ibid.

⁷⁸ European Council, "Council Regulation (EC) No 1801/2006 of 30 November 2006 on the Conclusion of the Fisheries Partnership Agreement between the European Community and the Islamic Republic of Mauritania," accessed September 17, 2019, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2006.343.01.0001.01.ENG.

Mauretania, Morocco and the South Pacific was in between 32,9 and 41,3% of the total.⁷⁹

We calculated the economic value of the FPA with Mauretania based on the relative share of pelagic freezer trawlers and the German quota for pelagic freezer trawlers. The total benefit for the German fleet of pelagic freezer trawlers was €21.8 million between 2006 and 2018. As German demersal trawlers are not considered by the agreement, Parlevliet and van der Plas is effectively the only German beneficiary of the agreement. Obviously, Parlevliet and van der Plas also benefited from EU contributions under the same agreement in other European countries, i.e. the Netherlands.

The second major factor of indirect support to European fisheries are **tax exemptions for fuel**. Since 27 October 2003, energy products supplied for use as fuel for the purpose of navigation within community waters, including fishing, are exempted from taxes (Directive 2003/96/EC).⁸⁰ It is evident that this effectively supports the European fishing sector.

The tax exemption was estimated by Profundo which calculated (1) *fuel consumption* for each vessel and (2) *estimations for tax exemptions* based on other fuel taxes. The annual fuel consumption of each vessel was calculated with (A) the average fuel consumption of each vessel, (B) the relative time vessels spent fishing in EU and West African waters, and (C) the relative overall activity of each vessel (A*B*C).⁸¹

Following the approach by Profundo we calculate the savings the Parlevliet fleet in Germany has due to tax exemptions. The first value (A), the annual fuel consumption for each vessel, was calculated on the basis of published total fuel costs of three vessels of P&P subsidiaries (KW 170 Annie Hilina, KW 172 Dirk Diederik, and KW 174 Anelies Ilena) in 2007 and 2008. The authors subtracted bunker prices for fuel and calculated an average value for the fuel consumption per KW. This average value was multiplied with the engine size of all other ships. For our uses, we used the same average value for liters (1,000s) per KW.

The second value, the relative time vessels spent fishing in EU and West African waters was estimated based on information supplied by Greenpeace. This data was taken from satellite data (Lloyds vessel tracking data and AIS). We added further data from an open vessel tracker website for the time between 2012 and 2018.⁸² The collected data and corresponding table can be reviewed in the Annex.

The third value, the relative overall activity of each vessel, was estimated based on the same data. If a vessel has been inactive for more than six months, this was accounted for in the activity value. The relative value was calculated by dividing the total months a vessel was active by the total number of months of the research period. Inactivity below six months was not considered, because the fuel consumption was already based on data that accounted for the fact that vessels are not actively fishing every day.

79 Uwe Richter, "Stand Und Entwicklung Der Hochseefischerei in Deutschland."

80 Jan Willem van Gelder, "Direct and Indirect EU Support for the Members of the Pelagic Freezer-Trawler Association (PFA)."

81 Ibid.

82 Global Fishing Watch, "Global Fishing Watch - Sustainability through Transparency," *Global Fishing Watch*, accessed September 19, 2019, <https://globalfishingwatch.org/>.

Actual tax exemptions cannot be given for a non-existent tax. The authors of the Profundo report estimated that the pelagic trawlers of Parlevliet and van der Plas on average use 80% heavy fuel oil and 20% gas oil. They calculated the tax for gas oil for road transport as an average of 0.45€ per liter and for heavy fuel oil for heating purposes as an average of 0.04€. For our calculation we updated this value with the EU average for all taxes included in consumer prices of automobile gas oil and fuel oil for the period between 3.1.2005 – 9.9.2019.⁸³ For our calculation this method gives us an average of 0.66€ per liter of gas oil for road transport and 0.17€ for heavy fuel oil for heating.

Assuming that the fuel would be taxed at about 64 cents per liter, comparable to the taxes on gas oil for road transport, the fuel support from 2006 to 2018 for the German Parlevliet and van der Plas pelagic trawler fleet is calculated as annual € 23,1 million and 230 million € in total.

In a different scenario, the tax level of gas oil of road transport (€ 0.66 per liter) and the level of heavy fuel oil for heating purposes (€ 0.17 per liter) was used. In this scenario, the tax exemption for Parlevliet en Van der Plas was calculated as € 5.9 million annually and € 59.6 million in total for the period from 2006 - 2018.

A table showing the calculations can be reviewed in the Annex.

4.2.3 A Piece of the Puzzle: The Euro-Baltic Fish-Processing Plant

The Euro-Baltic fish processing GmbH was founded in 2001 by Parlevliet van der Plas.

It is included in this section as a good example of methods used by large-scale companies with sufficient capital for large-scale investments to acquire public funding for expansion.

The fish processing plant of the same name opened in October 2003. Managing directors of the plant are Dirk Jan Parlevliet, Dr. Uwe Richter and Anton van der Plas. In early press reports it is mentioned that herring, cod, flounder and sprat can be filleted, marinated and flash frozen. Today,

only herring is processed. The plant started with a processing area of 14,000m² and an annual capacity of 50,000 tonnes of fish. Within 24 hours, 500 tonnes of fish can be filleted. It also has highly automated sorting, filleting and freezing facilities and a cold store for 20,000 tonnes of fish.⁸⁴

In the automatic sorting system, up to 35 tonnes of fish products can be sorted. The plant also has its own fishmeal production facility and water treatment facilities. Treated water is pumped directly into the Baltic Sea. The number of employees was estimated at up to 150 during the first years of operation.

By 2007, the plant was expanded to include new buildings as well as freezing and water treatment plants. At the time of the expansion, press releases indicated that capacity would increase to more than 70,000 tonnes. The number of employees would thus rise to about 200.⁸⁵ However, according

83 European Commission, "Weekly Oil Bulletin," Text, *Energy - European Commission*, last modified January 7, 2019, accessed September 19, 2019, <https://ec.europa.eu/energy/en/data-analysis/weekly-oil-bulletin>.

84 dpa, "Euro-Baltic Startet Fischverarbeitung," *DIE WELT*, October 5, 2003, accessed August 22, 2019, <https://www.welt.de/print-welt/article264198/Euro-Baltic-startet-Fischverarbeitung.html>.

85 "Euro-Baltic Fish Processing Centre Expansion."

to recent press releases, the plant still has a capacity of 50,000 tonnes. The number of employees varies in different sources. The highest number is around 200. In the profile of the factory on the website of the fish magazine, an industry publication, the number of employees is given as 122.⁸⁶

The cost of constructing and commissioning the fish processing plant was estimated at approximately €100 million - 55% of this was financed with EU funding. The expansion of the plant cost about €35 million, of which 30% was financed by Germany.⁸⁷ Another source points out that these figures are not reflected in the accounts of Parlevliet and van der Plas' subsidiaries. Funding may have been given to construction companies and other contractors, so they cannot be understood as direct payments.⁸⁸

Support for the Eastern-German Region?

To date, the fish processing plant uses its capacity of 50,000 tonnes of herring. The amount and origin of the processed herring varies in different sources. However, it seems that this information is used to put pressure on decision makers and the public.

On 17 January 2019, Uwe Richter was quoted by NDR1 radio station, where he said that 40,000 tonnes of herring (80% of the Euro-Baltic processing capacity) were fished in British waters.⁸⁹ On July 8, Uwe Richter was quoted by the Schweriner Volkszeitung, that 45,000 tonnes of herring (90% of the capacity of the Euro-Baltic factory) were caught in British fishing grounds. He also stated that 5,000 tonnes were brought to the factory from the Western Baltic Sea⁹⁰. Since the herring quota for Germany in the Western Baltic Sea was 4,966 tonnes, all of it had to be processed at Euro-Baltic.

On September 9, Uwe Richter was quoted by press agency dpa, that 100% of the herring catches of the Doggerbank fishing company were caught in British waters. He also went on to say that 100% of herring processes in the Euro-Baltic factory were caught in British waters⁹¹. However, it is unclear, whether Richter increased the significance of herring from British fishing grounds to emphasize the request for financial support in case of a hard Brexit, or if he used the herring from the Western Baltic to highlight the significance of the plant for the region.

In any case, the Euro-Baltic fish processing plant seems to be an important piece of the puzzle in the structure of the German subsidiaries of Parlevliet & Van der Plas. In a written text by Uwe Richter in 2011, he claims that in 2010 the German authority (BLE) reduced the North Sea herring quota of Doggerbank Seefischerei GmbH (Parlevliet & Van Der Plas Group) by 1,000 tonnes without substitution and swapped it for Baltic herring. A plea to deliver these Baltic herring catches to the Euro-Baltic plant was ignored largely by the benefiting Baltic fishers. Richter writes of a 'moral obligation' most of the fishers did not comply with. As a response, an undescribed deal was made

86 "Fischmagazin.de - Euro-Baltic Fischverarbeitungs GmbH."

87 "Euro-Baltic Fish Processing Centre Expansion." Ibid. "Euro-Baltic Fish Processing Centre Expansion."

88 Jan Willem van Gelder, "Direct and Indirect EU Support for the Members of the Pelagic Freezer-Trawler Association (PFA)."

89 NDR, "Fischwirtschaft in MV fürchtet Brexit," accessed September 12, 2019, /nachrichten/mecklenburg-vorpommern/Fischwirtschaft-in-MV-fuerchtet-Brexit,brexit418.html.

90 Birgit Sander, "Fangquote: Verbot Für Dorsch Aus Östlicher Ostsee Schon Im August | Svz.De," Svz, accessed September 12, 2019, <https://www.svz.de/regionales/mecklenburg-vorpommern/verbot-fuer-dorsch-aus-oestlicher-ostsee-schon-im-august-id24621857.html>.

91 "Deutsche Hochseefischer: Furcht vor ungeregeltem Brexit," accessed September 12, 2019, <https://www.cnv-medien.de/news/deutsche-hochseefischer-furcht-vor-ungeregeltem-brexit-1.html>.

to force fishers to deliver to the Euro-Baltic, a 'win-win' situation as Richter describes it.⁹²

By 2018, all herring products of the Euro-Baltic plant had been MSC certified. A correction to the baseline for sustainable biomass stocks of herring in the Western Baltic Sea in the summer of 2018 led to a removal of the MSC certification from corresponding products. The baseline has been raised from 90,000 tonnes to 120,000 tonnes. The current herring stock in the Western Baltic Sea is around 105,000 tonnes, below the revised guideline value.⁹³ In a TV broadcast by NDR⁹⁴, Richter stated that without MSC certification, the Euro-Baltic company would not buy the catches, or only to lower prices. Fisherman associations were cited as preferring to sell their catches to other buyers in this case.

Fishing, Processing, Selling – The value chain in the hand of Parlevliet and van der Plas

Comparing herring quotas given to the pelagic high seas fleet which is effectively the Parlevliet fleet (54,000 tonnes according to their CSR report in 2017, 53,000 tonnes according to Minister Backhaus – see section on Parlevliet quota) with the capacity of the Euro-Baltic plant built in 2009 (50,000 tonnes annually) it becomes quite apparent that the plant was built for one reason specifically: to process the herring fished by Parlevliet fleet in British waters in a plant owned entirely by Parlevliet and financed as much as possible by European and German tax money. The recent acquisition of German seafood company Deutsche See completes the picture.

The strategy to control the whole value chain of herring products is heavily threatened by a probable hard Brexit. If the British government does not join agreements for fishing after leaving the EU, 90%-100% of the processing capacity would be unused. According to the Minister of Agriculture of Mecklenburg-Western Pomerania, the jobs of 250 primary fishermen, 200 additional seamen and more than 200 employees depend on the plant.⁹⁵ Uwe Richter has mentioned Norwegian fishing grounds as an alternative to the British ones.⁹⁶

92 Uwe Richter, "Einige Bemerkungen Zur Frühjahrsheringssaison 201 1 Und Neues von Der Euro-Baltic Fischverarbeitungs GmbH," 2012, <http://www.rostocker-hochseefischerei.de/aktuelles/dokumente/fischmarkt.pdf>.

93 NDR, "Ostsee-Hering verliert MSC-Nachhaltigkeitssiegel," accessed August 22, 2019, [/nachrichten/mecklenburg-vorpommern/Ostsee-Hering-verliert-MS-Nachhaltigkeitssiegel,fischerei204.html](https://www.ndr.de/nachrichten/mecklenburg-vorpommern/Ostsee-Hering-verliert-MS-Nachhaltigkeitssiegel,fischerei204.html).

94 NDR, *Ohne MSC-Siegel: Wer kauft den Ostseehering?*, n.d., accessed September 13, 2019, <https://www.ndr.de/fernsehen/sendungen/nordmagazin/Ohne-MS-Siegel-Wer-kauft-Ostseehering,nordmagazin55940.html>.

95 "Brexit-Folgen - Fish and Chips in Mecklenburg-Vorpommern."

96 NDR, "Fischwirtschaft in MV fürchtet Brexit."

4.3 Political Influence

4.3.1 Norway to the rescue: Industrial Influence on Northern Agreements

Beyond Fisheries Partnerships Agreements, the European Union also arranges so-called Northern Agreements with Norway, Iceland and the Faeroe Islands. These agreements regulate the joint management of shared stocks with Norway, Iceland and the Faeroe Islands. The Northern agreement with Norway includes three separate agreements: (1) the bilateral agreement between Norway and the EU covering the North Sea and Atlantic⁹⁷; (2) the trilateral agreement between Denmark, Sweden (represented by the EU) and Norway covering Skagerrak and Kattegat⁹⁸, and (3) the neighboring arrangement between Sweden (represented by the EU) and Norway covering Swedish fishery in Norwegian waters of the North Sea.⁹⁹

Based on the bilateral agreement, the EU and Norway hold annual consultations setting the total catch for the commonly managed fishing area. These consultations are held between delegations of the EU and Norway – both delegations include scientists and representatives of the fishing industry, however civil society members (NGOs) have not been permitted to join since 2018. Representatives of the fishing industry are involved in these delegations. This was also raised in a parliamentary question of the Green Party in the Bundestag. In a written answer, the Federal Ministry of Food and Agriculture stated that representatives of the fishing industry are not participating in the negotiations between the European Commission and Norway. They are, however, on site to be available to meet the German government representatives for personal consultations at short notice.¹⁰⁰

According to the Federal Government's response, these consultations deal with the practical implications of quota swaps between the EU and Norway and the consequences of technical regulations. The determination of the total allowable catch was not mentioned, despite it being a major feature of the consultations.

In the 2019 agreement between the EU and Norway (made during 2018 consultations), it is stated that the Norwegian Delegation raised significant concerns about the overfishing of juvenile herring and the future yield for the species. As the overall recruitment has been on a low level since 2002, the Norwegian Delegation called for a limitation of catches to rebuild the stock. The TAC for herring was nonetheless raised against the recommendation of ICES. Explanations were not stated in the protocol.

97 European Union, "AGREEMENT between the European Union and the Kingdom of Norway on Reciprocal Access to Fishing in the Skagerrak for Vessels Flying the Flag of Denmark, Norway and Sweden" (Official Journal of the European Union, July 30, 2015), accessed September 11, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52016PC0413&from=EN>.

98 Ibid.

99 European Commission, "Bilateral Agreements with Countries Outside the EU - Northern Agreements," Text, *Fisheries - European Commission*, last modified September 16, 2016, accessed September 13, 2019, https://ec.europa.eu/fisheries/cfp/international/agreements/norway_en.

100 "Antwort Der Bundesregierung Auf Die Kleine Anfrage Der Abgeordneten Friedrich Ostendorff, Steffi Lemke, Harald Ebner, Weiterer Abgeordneter Und Der Fraktion BÜNDNIS 90/DIE GRÜNEN" (Deutscher Bundestag, July 22, 2019).

However, in the written answer to question of the Group of the Green Party, the Federal Government stated that the ICES recommendations for herring in commonly managed areas were exceeded based on socio-economic interests. P&P CEO Diek Parlevliet is listed as industry for Netherlands and Germany in the EU delegation list for 2017 consultations to develop a 2018 agreement¹⁰¹, and although we did not procure a list of participants for the 2018 consultations, it can be reasonably assumed that a Parlevliet representative attended.

Out of 16 TACs agreed between the EU and Norway for 2019, nine were set more than 25% above scientific advice for maximum sustainable yield (MSY), and a further five were set above MSY considering exemptions from the landing obligation, despite the obligation to follow MSY in the EU Common Fisheries Policy.¹⁰² The EU Commission acknowledges that the level of overfishing agreed between EU and Norway for shared fish populations is an ongoing challenge and is higher than for those fish populations which the EU has sole responsibility over (and where industry representatives are not officially part of the delegations).¹⁰³

It is evident that the consultations of business representatives are important here. Fishing industry representatives are de facto involved in the negotiations between the EU and Norway, even if they hold no mandate to do so.

On the question of why the Federal Government does not also involve civil society representatives in the negotiations, the ministry answered dryly that the composition of the EU delegation does not lie in the hands of the German Government despite the Head of Delegation for the European Commission directing NGOs to their national governments for participation in the consultations.¹⁰⁴

4.3.2 Industrial Influence on Fishing Policies

The number of meetings between representatives of the German high seas fisheries association with high ranked politicians and officials mentioned in the reports of the association and media reports are a strong indication for the high level of political influence that this specific section of German fisheries has. And as we have seen before this section of the fisheries consists of P&P and Samherhij.

With regards to the general climate of the cooperation it is telling that in its yearly report in 2016, the Association of High Seas Fisheries of Germany states that "the German high-seas fisheries association feels very well represented on the international level by the politicians of the federal ministry of food and agriculture."¹⁰⁵

In the yearly report of 2018, the tone is even more gleeful when it comes to the cooperation of the German authorities: "The collaboration with the public authorities is seen as extremely positive by the German high fisheries association."¹⁰⁶

¹⁰¹ EU-Norway consultations on fisheries arrangements for 2018 – Bergen, Norway, 27 November to 1 December 2017 – delegation

¹⁰² <https://our.fish/press/eu-norway-agreement-the-worst-outcome-for-fish-stocks-in-ten-years/>

¹⁰³ Maja Kirchner, European Commission, speaking at the conference 'Countdown to 2020: How far has the EU come in ending overfishing', <https://www.pewtrusts.org/en/about/events/2018/countdown-to-2020-how-far-has-the-eu-come-in-ending-overfishing>

¹⁰⁴ "Antwort Der Bundesregierung Auf Die Kleine Anfrage Der Abgeordneten Friedrich Ostendorff, Steffi Lemke, Harald Ebner, Weiterer Abgeordneter Und Der Fraktion BÜNDNIS 90/DIE GRÜNEN" (Deutscher Bundestag, July 22, 2019).

¹⁰⁵ Deutscher Hochseefischerei-Verband, "Jahresbericht Des Deutschen Hochseefischerei-Verbandes 2016."

¹⁰⁶ Deutscher Hochseefischerei-Verband, "Jahresbericht Des Deutschen Hochseefischerei-Verbandes 2018," last

As explained before, all of the companies forming the association are fully owned by either Parlevliet and Van der Plas or Samherji. So it is no surprise that the signature under both reports is from Uwe Richter, CEO of Doggerbank as well as the Euro-Baltic fish-processing plant and thus effectively in charge of managing the German high seas fleet owned ultimately by Parlevliet & Van der Plas.

It can be argued that whenever the following paragraphs mention meetings and activities of the 'Association of German High Seas Fisheries', one could exchange that association with Parlevliet & Van der Plas and Samherji HV:

"The High Seas fisheries has been active in the discussions and opinion-forming processes with regards to the Reform of the EU common fisheries policy."¹⁰⁷

On May 27th 2015 it was German chancellor Angela Merkel who baptized the newly built ship ROS 777 "Mark".¹⁰⁸

On February 1st 2016, the first parliamentary breakfast of the German high-seas fisheries association took place. Among the participants were many members of the German parliament, all spokespeople of the various political parties as well as both federal secretaries Peter Bleser and Enak Ferlemann as well as other representatives from politics and scientific community."¹⁰⁹

On September 7th 2017 the minister of the Federal Chancellery Peter Altmaier and other high ranking politicians visited the Euro Baltic processing plant. Altmaier assured that his party was doing whatever possible to counteract negative scenarios from a Brexit and said that fisheries issues have been anchored in the election program of the CDU.¹¹⁰

"On May 15th 2018, German high-seas fisheries association invited to the yearly parliamentary breakfast. Various members of the German parliament and experts from different ministries attended the occasion that took place at the venerable palais of the German Reichstag where the parliament meets."¹¹¹

"Looking at the coming Brexit the political players were informed with what consequences the sector is calculating. Dr. Richter made clear that hundreds of jobs in structurally disadvantaged regions are at stake."¹¹²

"On July 2nd 2018 Werner Kuhn, member of the European parliament and deputy chairman of the fisheries committee in the European parliament visited the fish processing plant in Mukran. Together with the executive director of the plant, Dr. Uwe Richter, he had invited to a press meeting. The focus was the analysis of the situation of the herring fisheries taking into account possible scenarios of Brexit"¹¹³

"These discussions were continued during a visit of the Minister for Agriculture and Environment of

modified March 14, 2019, accessed July 25, 2019, <https://www.deutscher-fischerei-verband.de/downloads/DHV%20Jahresbericht%202018.pdf>.

107 Ibid.

108 "fischmagazin.de - Sassnitz/Rügen: Angela Merkel tauft neuen Hochseetrawler," accessed August 24, 2019, <https://www.fischmagazin.de/newsartikel-seriennummer-3761-SassnitzRuegen+Angela+Merkel+tauft+neuen+Hochseetrawler.htm>.

109 DEUTSCHE SEE Holding GmbH, "DEUTSCHE SEE Holding GmbH Bremerhaven Jahresabschluss Zum 30.09.2017."

110 "Altmaier Bei Euro-Baltic," accessed August 22, 2019, https://www.deutscher-fischerei-verband.de/1_15522_1.html.

111 Deutscher Hochseefischerei-Verband, "Jahresbericht Des Deutschen Hochseefischerei-Verbandes 2018."

112 Ibid.

113 Ibid.

Mecklenburg-Vorpommern, Dr. Till Backhaus on August 1st 2018 at the fish processing plant."¹¹⁴

"Over the course of the year various consultations with representatives of the senate and the parliament of the states of Bremen and lower Saxony took place."¹¹⁵

"In December the meeting of the high seas fisheries association with the heads of the fisheries divisions of the states which has become a tradition took place in the Hotel Hafen Hamburg."¹¹⁶

Dr. Gero Hocker (FDP), who is a German parliament member of the Committee for Food and Agriculture, is also president of the German fisheries alliance.¹¹⁷

Before entering the German parliament in 2017 Hocker was part of the parliament of lower Saxony from 2009 to 2017. As such he initiated various queries with relation to the fisheries sector.

While all queries indicate a pro fisheries perspective, only some can be interpreted specifically as advocacy for the industrial fishing sector.^{118 119}

Other FDP politicians initiating the queries were Horst Kortlang and Christian Grascha.

4.3.3 Producer Organizations

EU Regulation 1379/2013 on the Common Organization of the Markets in Fishery and Aquaculture Products (CMO) defines how producer organizations are recognised, and what the objectives of producer organizations should be.¹²⁰ Following this Regulation, member states may recognize groups as producer organizations, if they follow some formal rules (Article 17), including details of activity in the member state, membership, governance, and not abusing a dominant position in the market. They have to comply with the competition rules laid down in the Treaty on the Functioning of the European Union.

The regulation states that the objective of producer organizations is to aid implementation of the CFP and to promote viable and sustainable fishing activities of their members in compliance with conservation policy and environmental law. It is clear that producer organizations are positioned in the regulations as an integral part of a good governance system as well as responsible receivers of quota shares.

However, a report by the Low Impact Fishers of Europe (LIFE) that analyses the management of producer organizations within the framework of the CFP and the CMO in various EU member states, highlights:¹²¹

“Measures should be taken to encourage the appropriate and representative participation of small-

114 Ibid.

115 Ibid.

116 Ibid.

117 “abgeordnetenwatch.de | Profil von Dr. Gero Hocker, FDP - Bundestag,” *abgeordnetenwatch.de*, accessed July 25, 2019, <https://www.abgeordnetenwatch.de/profile/dr-gero-hocker>.

118 Landtag Niedersachsen, “- Drucksache 17/7161 - Small Query to Parliament of Lower Saxony - Catch Prohibitions of North Sea Fishers in the Baltic Sea,” January 10, 2017, https://www.landtag-niedersachsen.de/drucksachen/drucksachen_17_7500/7001-7500/17-7242.pdf.

119 Landtag Niedersachsen, “Drucksache 17/5546 - Will There Be a Fishing Prohibition in Parts of the North Sea?,” April 7, 2016, https://www.landtag-niedersachsen.de/drucksachen/drucksachen_17_7500/7001-7500/17-7242.pdf.

120 European Commission, “REGULATION (EU) No 1379/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2013,” December 18, 2013, <https://eur-lex.europa.eu>.

121 Low Impact Fishers of Europe Limited, “Fishy Business: Fish POs in the EU,” n.d.

scale producers.” (CMO preamble paragraph)

However, the report warns that "Member States and the Commission are unaware of the collective market positions of internationally trading large industrial businesses and their control and influence on recognized POs across Member States" and remarks that "there is virtually no appropriate and representative participation of small-scale producers."

The report rightly asks the question whether PO's that are ultimately controlled by one single company meet the 2009 regulation's requirement to be a legal entity "set up on the own initiative of a group of producers" (plural) and form its own producer organization eligible for recognized status.

German producer organizations

Against this background it is important to take a closer look at the landscape of German PO's. To be eligible for gaining a quota as a producer organization, the organization has to be registered as recognized producer organization with the EU. The list of registered German organizations consists of 13 organizations.¹²² Six of them are based in Mecklenburg western Pomerania, two in Schleswig-Holstein and five in Lower Saxony.

Of these, five (see table below) are cooperatively organized fishermen. Information on the members of the cooperatives is not apparent from the publicly available registers.

Name	Address
Fischereigenossenschaft Elsfleth e.G.	Brake, Lower Saxony
Erzeugerorganisation Usedomfisch e.G.	Freest, Mecklenburg-Western Pomerania
Zentrale Absatzgenossenschaft "Rügenfang"	Sassnitz, Mecklenburg-Western Pomerania
FG "Wismarbucht" e.G.	Wismar, Mecklenburg-Western Pomerania
Erzeugerorganisation Küstenfischer Nord eG	Heiligenhafen, Schleswig-Holstein

5 German PO's organized as cooperatives

However, the three cooperatives based in Mecklenburg-Western Pomerania are members of the „Vereinigung der Erzeugerorganisationen der Kutter und Küstenfischer Mecklenburg-Vorpommern“, together with the producer organization "Fischfang u. Fischverwertung Stralsund u. Umgebung GmbH".

In addition to the cooperative producer groups, a further seven are organized as limited liability companies (GmbH). Only the producer community "Schleswig-Holsteinischer Muschelzüchter" (mussel breeders of Schleswig-Holstein) is a registered association. They and the producer organisation "Erzeugergemeinschaft Deutscher Krabbenfischer" (German shrimp fishers) have not been further investigated in this report.

Name	Location
Erzeugerorganisation Fischfang u. Fischverwertung Stralsund u. Umgebung GmbH	Sundhagen, Mecklenburg-Vorpommern

122 EU comission, "LIST OF THE RECOGNISED PRODUCER ORGANISATIONS IN THE FISHERY AND AQUACULTURE SECTOR," July 19, 2019, <https://ec.europa.eu/fisheries/sites/fisheries/files/list-of-recognised-producer-organisations-and-associations-of-producer-organisations.pdf>.

Vereinigung der Erzeugerorganisationen der Kutter und Küstenfischer Mecklenburg - Vorpommern	Stralsund, Mecklenburg-Vorpommern
Erzeugergemeinschaft der Nord- und Ostseefischer	Cuxhaven, Niedersachsen
Erzeugergemeinschaft der Deutschen Krabbenfischer GmbH Cuxhaven	Cuxhaven, Niedersachsen
Erzeugergemeinschaft Küstenfischer der Nordsee GmbH, Norden/Ostfriesland	Großheide, Niedersachsen
Erzeugerorganisation schleswig-holsteinischer Muschelzüchter e.V.	Neukirchen, Schleswig-Holstein
Seefrostvertrieb GmbH	Sassnitz-Neu Mukran, Mecklenburg-Vorpommern

Of five producer groups registered as limited liability companies, the shareholders were found:

- The producer organization “Küstenfischer der Nordsee” GmbH is a coalition of 25 individuals.¹²³
- The “Vereinigung der Erzeugerorganisationen der Kutter und Küstenfischer Mecklenburg-Vorpommern“ consists of four partners, the three above-mentioned cooperatives from Mecklenburg-Western Pomerania and the producer organization “Fischfang u. Fischverwertung Stralsund u. Umgebung” GmbH.
- The producer organisation Fischfang u. Fischverwertung Stralsund u. Umgebung GmbH is an association of four fisheries cooperatives and 18 individuals. As mentioned above, this producer organization is also a shareholder of the producer organization “Vereinigung der Erzeugerorganisationen der Kutter und Küstenfischer Mecklenburg-Vorpommern“ together with the three cooperatives in Mecklenburg-Vorpommern.¹²⁴
- The producer organization “Nord- und Ostseefischer“ comprises 90 associates, 17 of which are companies, 5 cooperatives, 4 shipping companies and 64 individuals.¹²⁵
- The producer organization Seefrostvertrieb GmbH has 8 shareholders (see table), of which 7 are subsidiaries of Parlevliet van der Plas. Six of the companies are located at the same address of the producer company and the Euro-Baltic fish-processing factory.¹²⁶

Deutscher Seefrostvertrieb = Parlevliet & Van der Plas + Samherji HV

Despite listing nine companies as members, the PO Deutscher Seefrostvertrieb effectively

123 “Gesellschaftsvertrag Der Erzeugergemeinschaft Küstenfischer Der Nordsee GmbH,” n.d.

124 Vereinigung der Erzeugerorganisation der Kutter- und Küstenfischer Mecklenburg-Vorpommern GmbH, “Liste Der Gesellschafter Der Firma Vereinigung Der Erzeugerorganisation Der Kutter- Und Küstenfischer Mecklenburg-Vorpommern GmbH” (Amtsgericht Stralsund, n.d.), <https://www.handelsregister.de>.

125 Erzeugergemeinschaft der Nord- und Ostseefischer GmbH, “Liste Der Gesellschafter Der Erzeugergemeinschaft Der Nord- Und Ostseefischer GmbH” (Amtsgericht Tostedt, n.d.), <https://www.handelsregister.de>.

126 Seefrostvertrieb GmbH, “Liste Der Gesellschafter Der Seefrostvertrieb GmbH” (Amtsgericht Stralsund, n.d.), accessed August 23, 2019, <https://www.handelsregister.de>.

represents three companies active in high seas fisheries, two of which are 100% daughter companies of Palevliet & Van der Plas, the other being a 100% daughter company of Samherji HV.

Name	Adress	company share in %
Deutsche Fischfang-Union & Co KG	Cuxhaven, Niedersachsen	55,823
Mecklenburger Hochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	2,219
Oderbank Hochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	2,033
Ostbank Hochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	1,849
Doggerbank Seefischerei GmbH	Bremerhaven, Bremen	31,977
Nordbank Hochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	2,033
Warnemünder Hoochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	2,033
Westbank Hochseefischerei GmbH	Sassnitz, Mecklenburg-Vorpommern	2,033

It should be noted that the producer organization Seefrostvertrieb is the only one representing companies with large pelagic freezer trawlers in Germany, and all of them belong to Parlevliet and van der Plas. It can be questioned if this contradicts Article 14 of the CMO regarding a dominant market position, i.e. in regard to access to the pelagic freezer trawler component of the Fisheries Partnership Agreement with Mauritania (see chapter 4.2.2).

A similar setup can be observed with regards to the producer organization Fish Producer Organisation Limited in the UK.

As analyzed in a report by LIFE (Low Impact Fishers of Europe) the producer organization "Fish Producer Organisation Limited" that was holding 242,224 total FQA units in 2017 and effectively consists of members owned completely by the mother company UK Fisheries Limited which in turn is jointly owned by Samherji group of Iceland and Parlevliet & Van der Plas group.¹²⁷

Another interesting PO in the UK is the North Atlantic Fish Producer organization Limited (NAFPO), which held 94% of the UK herring quota in Area 4c7d and 13% of the North Sea herring quota. It is ultimately controlled by the Dutch company Cornelis Vrolijk who has close relations with Parlevliet, for instance by holding the majority shares of Seafood Parlevliet, of which Mike Parlevliet is still on the board.¹²⁸

The report by LIFE also concludes: "it could be revealing to analyze the compliance of PO Seefrostvertrieb with competition rules under the TFEU (art. 101-102 TFEU)." Furthermore, they reveal that the shareholder agreement of Seefrostvertrieb fails to include the wording of the

127 Low Impact Fishers of Europe Limited, "Fishy Business: Fish POs in the EU."

128 Cornelis Vrolijk, "Overname Seafood Parlevliet Door Cornelis Vrolijk Officieel Bekrachtigd," last modified September 29, 2016, accessed August 21, 2019, https://www.cornelisivrolijk.eu/news_39_29_Overname+Seafood+Parlevliet+door+Cornelis+Vrolijk+officieel+bekrachtigd.html.

objectives laid down in art. 7 par. 1 of the CMO regulation and instead states: “The company’s purpose is to represent the shareholder interests towards third parties in the framework of organizing high seas fisheries as well as the marketing of the sea frozen fish and fish products produced and landed by the shareholders.”

5 Annex

5.1 Extensive List of P&P fleet

There is a list of 33 vessels on the Parlevliet website:

Fleet list (pelagic):

Annelies Ilena (KW174)

Annie Hillina (ROS170)

Dirk Dirk (KW172)

Helen Mary (ROS 785)

Jan Maria (BX791) (sold to Russia in late 2018)¹²⁹

Maartje Theadora (ROS 171)

Margiris (KL855)

Naeraberg (KG14)

Fleet list (demersal):¹³⁰

Andre Leduc (BL 924680)

Arosa Catorce (3 CO-2-3846)

Arosa Doce (3 CO-2-3845)

Artic Warrior (H 176)

Bressay Bank (BL 900470)

Cap Nord (BL 734 690)

Cap Saint Georges (BL 924675)

Dorado (LVL 2133)

Farnella (H 135)

Grande Hermine (SM 640670)

Joseph Roty (SM 199078)

Klondyke (FHPJ)

Mark (ROS 777)

Nordic 2 (BL 341160)

Ocean Tiger (R 38)

Kirkella (2HF18)

Haltenbank II (BL 931410)

129 Deutscher Fischerei-Verband e.V., "Aktuelles," *BX 791 "Jan Maria" Geht Nach Russland*, last modified September 14, 2018, accessed September 11, 2019, <https://www.deutscher-fischerei-verband.de/aktuelles.html>.

130 Parlavliet, "Parlevliet & van Der Plas > Home."

Nuevo Virgen de Lodairo (59973)

Nuevo Barca (3aVI-5-1-14)

Brites (A-2130-N)

Joana Princesa (A-2053-N)

Praia de Santa Cruz (7-12-M)

Dorado (ROS 804)

Nida (KL759)

Gerda Maria (ROS 783)

Joseph Roty II (SM 199078)

However, besides these 33 vessels there are quite a few more from recent acquisitions or simply not included in the list.

Since the acquisition of a majority stake in Dutch fish processor “Dadas Groep”, their corresponding fleet has joined the Parlevliet fleet. The exact composition of this fleet part has not been completely established during the research for this report. Dadas writes on their website: "Dutch Flat Fish has its own fishing boats still sail the North Sea daily under the inspired leadership of the De Boer brothers, born and raised fishermen from the fishing village of Urk. . [...] Due to the increasing demand for our quality products, we are steadily increasing our fleet, of course, all in regular frameworks and agreed quotas. "On the site only the vessels UK-56, UK-131, UK-57 and UK-456 are depicted.

Potential additional vessels found on (what is this citation) a privately run website focussing on harbours and ship sightings¹³¹

UK33 Gegr. P. en T. de Boer bv

UK44 Vof. J. & L. de Boer

UK57 Dadas

UK104 Red. L. de Boer & Zonen bv

UK112 T. de Boer & Zonen bv

UK133 Zeevisserijbedr. Gebr. P & T de Boer B V

UK156 Red. L. de Boer & Zn.

UK224 T. de Boer & Zonen bv

UK225 Gebr. de Boer & Zn

UK266 L. de Boer (apparently often in German ports (Büsum))

The vessels owned by joined ownership companies also do not always seem to be on the list as in the case of the newly acquired trawler *Emeraude*. "Emeraude, owned by French firms Euronor and Compagnie Des Peches, two companies in which P&P is a shareholder, will also catch for cod in the Barents Sea."¹³² The *Kirkella* on the other hand, owned by jointly owned UK fisheries is included.

131 Ibid.

132 Global Mediator, “Dutch Giant Parlevliet & Van Der Plas Adds Two New Vess,” *IntraFish*, last modified July

5.2 Movement of P&P fleet Germany

	Annie Hillina	Helen Mary	Maartje Theadora	Gerda Maria	Mark	Jan Maria	Atlantic Peace
1/2012	EU	West Africa	West Africa	Norway	not yet part of PP fleet	EU	Norway / Fa
2/2012	Iceland	EU	EU	Faroer / Greenland		EU	Norway / Fa
3/2012	Faroer / NN	Norway	EU	Faroer / Greenland		Norway	Norway / Fa
4/2012	EU	EU	EU	Norway		EU	Norway / Fa
1/2013	EU	EU	EU	Norway		EU	Norway / Fa
2/2013	EU / Iceland	-	EU	Faroer / Greenland		EU	Norway / Fa
3/2013	EU	EU		Faroer / Greenland		Norway	Norway / Fa
4/2013	EU	EU	EU	Norway		EU	Norway / Fa
1/2014	EU	EU	EU	Norway		EU	Norway / Fa
2/2014	Iceland	West Africa	South America	Faroer / Greenland		EU	Norway / Fa
3/2014	Norway	West Africa	South America	Faroer / Greenland		EU	
4/2014	EU	EU	South America	Norway		EU	
1/2015	EU	West Africa	EU	Norway		EU	
2/2015	Iceland	West Africa	EU	Faroer / Greenland		Faroer / Greenland	EU
3/2015	Norway	EU	EU	Faroer / Greenland	Faroer / Greenland	EU	
4/2015	EU	EU	EU	Faroer / Greenland	Norway	EU	
1/2016	EU	West Africa	EU	Faroer / Greenland	Norway	EU	
2/2016	EU	West Africa	South America	Faroer / Greenland	Faroer / Greenland	EU	
3/2016	EU	EU	South America	Faroer / Greenland	Norway	EU	
4/2016	EU	West Africa	South America	Faroer / Greenland	Faroer / Greenland	EU	
1/2017	EU	EU	EU	Faroer / Greenland	Norway	West Africa	not pa
2/2017	Norway	EU	EU	Faroer / Greenland	Faroer / Greenland	EU	
3/2017	Norway	EU	EU	Faroer / Greenland	Norway	EU	
4/2017	EU	EU	West Africa	Faroer / Greenland	Faroer / Greenland	EU	
1/2018	EU	West Africa	EU	Faroer / Greenland	Norway	EU	
2/2018	Norway	EU	EU	Faroer / Greenland	Faroer / Greenland	EU	
3/2018	Norway	EU	EU	Faroer / Greenland	Norway	EU	
4/2018	EU	EU	EU	Faroer / Greenland	Faroer / Greenland	not part of PP fleet	
1/2019	EU	EU	EU	Faroer / Greenland	Norway		
2/2019	Norway	EU	EU	Faroer / Greenland	Faroer / Greenland		
Total quarters	30	29	29	30	17	27	
months calculated as saving from tax exemption	30	29	23	30	17	27	
Active	30	29	29	30	17	27	
% EU Waters	100,00 %	100,00 %	79,31 %	100,00 %	100,00 %	100,00 %	
% Active	100,00 %	100,00 %	100,00 %	100,00 %	100,00 %	100,00 %	

Operating areas and activity of the German fleet of P&P (2012 - 2019)

5, 2018, accessed July 25, 2019, <https://www.intrafish.com/fisheries/1528109/dutch-giant-parlevliet-and-van-der-plas-adds-two-new-vessels-to-fleet>.

5.3 Calculation of savings due to fuel exemptions

Savings due to fuel tax exemptions by the fleet of P6P in Germany – 2 scenarios (update focussing in the fleet using method by Profundo for 2006-2011133

Vessel	Engine (KW)	Fuel consumpt. bn 2006-18 (avg/yr) (A)	Fishing in the EU/Africa 2006-18 (avg/yr) (B)	Act. wity 2006-18 (C)	Fuel consumpt bn in the EU 2006-18 (avg/yr) (D)=A+B+C	Fuel exempt bn 2006-18 (avg/yr) (E)		EU support 2006-18 (avg/yr) (F)		Act. yeas (from 2006-2018)	
						(E1)	(E2)	(F1)=D*E1	(F2)=D*E2		
	KW	1.000 liters	%	%	1.000 liters	€	1.000 €	€	1.000 €		
						Scenario 1		Scenario 2		Scenario	
KW 170 Annie Hillina	2863,000	5.107,00	100,00 %	100,00 %	5.107,00	0,66	3.370,62	0,171	874,32	13	43.81
BX 786 Atlant ic Peace	2427,000	3.300,72	100,00 %	100,00 %	3.300,72	0,66	2.178,48	0,171	565,08	8,5	18.51
BX 791 Jan Maria	6000,000	8.160,00	84,04 %	92,00 %	6.308,90	0,66	4.163,87	0,171	1.080,08	11,5	47.88
ROS 171 Maartje Theadora	864,000	1.175,04	62,47 %	100,00 %	734,04	0,66	484,47	0,171	125,67	13	6.29
ROS 784 Dirk Dirk (now Naeraberg)	2600,000	3.536,00	100,00 %	100,00 %	3.536,00	0,66	2.333,76	0,171	605,36	4	9.33
ROS 785 Helen Mary	5299,000	7.206,64	90,06 %	100,00 %	6.490,59	0,66	4.283,79	0,171	1.111,19	13	55.68
ROS 786 Gerda Maria	3000,000	4.080,00	100,00 %	100,00 %	4.080,00	0,66	2.692,80	0,171	698,50	13	35.00
Mark	4000,000	5.440,00	100,00 %	100,00 %	5.440,00	0,66	3.590,40	0,171	931,33	3,75	13.46
Total Parlevliet en Van der Plas Germany							23.098,18		5.991,53		230.01

)

5.4 Excess quota for Germany in the Northeast Atlantic and Baltic Sea

Scientific advice and agreed quotas for Europe and Germany for 2017 – collated from 134

133 Jan Willem van Gelder, “Direct and Indirect EU Support for the Members of the Pelagic Freezer-Trawler Association (PFA).”

134 Griffin Carpenter, “Landing the Blame.”

Species	Area	Scientific advice (tonnes)	TAC agreed by ministers (tonnes)	Excess TAC (tonnes)	Excess TAC (%)	Excess TAC Germany (tonnes)	Excess TAC Ge species (
Herring	Union and Norwegian waters of IV north of 53° 30' N	275187	288788	13601	4,9	2403	
Herring	Union and international waters of Vb Vlb and VIaN	0	417	417	Advice = 0!	466	
Herring	IVc VIId	5046	52954	2494	49,4	35	
Herring	IIIa	40865	43573	2708	6,6	21	
Herring	IV VIId and Union waters of IIa	7888	11375	3487	44,2	17	
Cod	Baltic (22-24)	1588	5597	4009	252,5	855	
Cod	I IIb	29737	33025	3288	11,1	652	
Cod	Baltic (25-32))	24927	30857	5930	23,8	542	
Cod	Norwegian waters of I and II	20712	23002	229	1,1	277	
Cod	IV; Union waters of IIa; that part of IIIa not covered by the Skagerrak and Kattegat	274	29327	1927	703,3	250	
Cod	Skagerrak	4563	4884	321	7,0	7	
Cod	Kattegat	129	525	396	307,0	5	
Cod	Vlb; Union and International waters of Vb west of 12° 00' W and of XII and XIV	17	74	57	335,3	1	
Mackerel	VI VII VIIIa VIIIb VIIIc and VIIIe; Union and International waters of Vb; International waters of IIa	376906	407517	30611	8,1	1948	
Mackerel	IIIa and IV; Union waters of IIa IIIb IIIc and Sub divisions 22-32	32635	35286	2651	8,1	50	
Horse mackerel	Union waters of Iia Iva; VI VIIa-cVIIe-k VIIIa VIIIb VIIIc and VIIIe; Union and international waters of Vb; International waters of XII and XIV	5859	82229	23639	403,5	1826	
Dab and flounder	Union waters of Iia and IV	10484	18434	795	7,6	1221	
Plaice	IV; Union waters of IIa; that part of IIIa not covered by the Skagerrak and the Kattegat	9968	119389	19709	197,7	1137	
Plaice	Skagerrak	14053	16831	2779	19,8	11	
Ling	Union waters of IV	2149	3494	1345	62,6	83	
Ling	Union and international waters of VI VII VIII IX X XII and XIV	8423	13696	5273	62,6	72	
Ling	IIIa; Union water of IIIbcd	54	87	33	61,1	2	
Whiting	IV; Union waters of IIa	8952	12566	3614	40,4	87	
Whiting	VI; Union and international waters of Vb; international waters of XII and XIV	11	213	202	1836,4	1	
Anglerfish	VII	29535	33516	3981	13,5	41	
Anglerfish	Union waters of Iia and IV	13125	13521	396	3,0	15	
Anglerfish	VI; Union and international waters of Vb; international waters of XII and XIV	7426	765	224	3,0	9	
Anglerfish	Norwegian waters of IV	1456	15	44	3,0	1	
Common sole	Union waters of Iia and IV	14178	1503	852	6,0	57	
Greater silver smelt	Union and international waters of V VI and VII	3453	3884	431	12,5	33	
Greater silver smelt	Union and international waters of I and II	66	90	24	36,4	6	
Greater silver smelt	Union waters of III and IV	756	1028	272	36,0	2	
Sprat	IIIa	904	30784	21744	2405,3	33	
Sprat	VIIde	3678	412	442	12,0	2	
Turbot and brill	Union waters of Iia and IV	4488	4937	449	10,0	18	
Lemon sole and witch flounder	Union waters of Iia and IV	5848	6391	543	9,3	10	
Blue ling	Union and international waters of II and IV	0	53	53	Advice = 0!	4	
Blue ling	Union and international waters of III	0	8	8	Advice = 0!	2	
Spurdog/dogfish	Union and international waters of I V VI VII VIII XII and XIV	0	270	270	Advice = 0!	4	

(table includes all Species / Areas for which Germany profited from an Excess Quota)