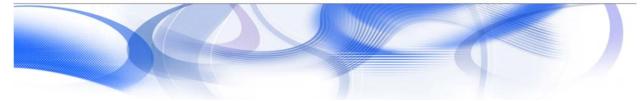
JRC Scientific and Technical Reports



Scientific, Technical and Economic

Committee for Fisheries (STECF)

Evaluation of 2011-2013 National Programmes linked to the Data Collection Framework

Report of the Subgroup on Research Needs (SGRN 10-01)

14-19 JUNE 2010, ISPRA, ITALY

Edited by Paul Connolly and Jarno Virtanen

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The Scientific, Technical and Economic Committee for Fisheries (STECF) has been established by the European Commission. The STECF is being consulted at regular intervals on matters pertaining to the conservation and management of living aquatic resources, including biological, economic, environmental, social and technical considerations.

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COMMISSION STAFF WORKING DOCUMENT

Evaluation of 2009 Annual Reports related to the Data Collection Framework (SGRN-10-02)

SUBGROUP ON RESEARCH NEEDS (SGRN) OF THE SCIENTIFIC, TECHNICAL AND ECONOMIC COMMITTEE FOR FISHERIES (STECF)

STECF OPINION EXPRESSED DURING THE PLENARY MEETING (PLEN-10-02)

Copenhagen, 12-16 July 2010

1. INTRODUCTION

STECF is requested to review the report of the SGRN-10-01 Working Group of June 14 - 19, 2010 (Ispra, Barza) meeting, evaluate the findings and make any appropriate comments and recommendations.

2. TERMS OF REFERENCE

1. Evaluation of 2011 and 2013 National Programmes.

To evaluate the 2011 to 2013 National Programmes submitted under the new Data Collection Framework (Council Regulation (EC) 199/2008) using the new Guidelines and Procedures developed in SGRN 09-03. The evaluation will be based on the overarching criteria of conformity and scientific relevance. The subgroup will also consider the performance of the new guidelines for submission of NPs and, where necessary, make appropriate recommendations for their improvement.

2. Response by MS to the call for economic data launched to produce the draft report on the "Economic Performance of EU Fishing Fleet: Annual Report 2010"

To evaluate the situation regarding the response by MS to the call for economic data launched to produce the draft report on the "Economic Performance of EU Fishing Fleet: Annual Report 2010 " Data failures will be clearly stressed by the group in order to allow the Commission to enforce MS obligations on a clear basis.

3. Comments made by STECF

To review the comments made by of STECF during the April 2010 Plenary in relation to the work of SGRN,

In particular on the following issues will be addressed;

- Data Deficiencies To present the state of play of user's feed back and develop a template and procedure for reporting data deficiencies by data user groups (e.g. STECF) and with particular emphasis on ICES expert groups.
- Review of Research Surveys To examine the current status of preparations for the review of research surveys to be carried out in October 2010.
- Marine Strategy Framework Directive. To address the collection of data under the DCF framework that relates to the Marine Strategy Framework Directive.
- 4. Comments made by 7th LM

To review the comments and action points made by the 2010 RCM's and the 7th Liasion Meeting in order to ensure that these recommendations are followed up

5. Regional Data Bases

To review progress on the development of regional databases following the RDB Workshop and discussions at the RCM and LM.

3. STECF COMMENTS AND CONCLUSIONS

STECF comments

STECF notes the tremendous efforts made by MS in compiling their multi-annual NP (2011 – 2013) in accordance with the new Guidelines (SGRN 09-03). STECF notes that MS have mostly complied with the new guidelines. Many issues identified can be addressed in the review of the guidelines scheduled for 2011. In general, the National Programmes (NP) were well laid out, especially the content index. STECF also appreciates that MS provided the NP proposal in English.

STECF shares the working group concern that no progress has been made in developing a clear and digitally-based evaluation process that includes a pre-screening of National Programmes and Technical Reports (TR) (see discussion SGRN 09-01). Specific guidelines on how to evaluate the new NP and TR are needed. STECF notes that SGRN developed proposed guidelines and procedures at the SGRN 10-01 and SGRN 10-02 meetings and recommends that they be formalised and finalised in 2011. STECF stresses the importance of a pre-screening of NP's and TR's to make future meetings as efficient as possible. STECF stresses the need to develop a simple electronic version of the evaluation procedure that can produce the required tables and summary information automatically as achieved by its SGMED WG. STECF considers that this issue should be reviewed as part of the SGRN Strategic discussions in early 2011.

SGRN was asked by STECF (April 2010 Plenary) to address the proposed collection of data under the Marine Strategy Framework Directive (MSFD). STECF notes that data collected under the DCF framework, particularly under the scheme for research surveys at sea (Council Regulation 199/2008), can be used to inform on indicators relating to some of the descriptors in Annex 1 of the MSFD.

STECF would point out that the review of DCF surveys scheduled for October 2010 will address ecosystem indicators, but not specifically in relation to the MSFD.

STECF welcomed the work of SGRN in relation to the Regional Database (RDB) issue and noted the progress made over the last year. STECF notes that the RDB meeting proposed by SGRN 09-04 took place in Brussels in February 2010 and that the various Regional Coordination Meetings (RCM's) have reviewed and commented on this report during their April-May 2010 meetings. STECF notes that the RCM Baltic agreed to use FishFrame as a RDB. The North Sea & Eastern Arctic RCM has agreed to use a disaggregated RDB. The Mediterranean & Black Sea RCM considers that a RDB is not necessary. STECF disagrees with the RCM view and in line with its general support for RDBs, considers that a RDB for the Mediterranean & Black Sea is highly desirable. The Long distance fishery RCM noted that databases are available from ICCAT and other relevant RFMO's. STECF notes that while such databases exist, they are not always readily accessible. STECF supports the proposal for a RDB Steering Group and notes that the first meeting is schedule to take place in late 2010.

STECF notes the large number of DCF-related meetings and deadlines over the first 7 months of 2010. The first 7 months of 2010 were very busy for the DCF community. STECF

recommends that meeting scheduling should be optimally spaced during the year to allow for the timely production of the relevant reports and to allow time for follow-up action by MS and other groups.

STECF recommendations

In order to further explore how data collected under the DCF can assist an ecosystem approach to Fisheries management (EAFM) which falls under the CFP and how such data relate to the implementation of the MSFD, STECF suggests the Commission could include this topic in the STECF work program 2011, preferably in early 2011. Participants of such an STECF working group meeting should consist of a mix of MSFD and DCF experts. STECF suggests the following Terms of Reference for this working group:

(1) to examine the descriptors listed in Annex 1 of the MSFD with their associated indicators and data requirements in relation to data from DCF research vessel surveys.

(2) to consult the Commission Decision on MSFD (published in summer 2011), the MSFD Management and Task Group reports¹, and the review paper published in Marine Policy in 2010 on the links between the CFP and $MSFD^2$

(3) to examine how the current data collected under the DCF could be used to provide information on the indicators for the MSFD descriptors as defined by the MSFD Task Groups. The DCF data sets should be confined to those generated from at sea surveys.

(4) to examine if new data sets could be collected under the DCF and used to provide information on the indicators defined for the MSFD descriptors. The proposed new data sets should be confined to those generated from at sea surveys under the DCF.

STECF considers strategic planning to be a very important element of the SGRN work programme. STECF notes that SGRN meetings are generally devoted to evaluation of National Programmes and review of Technical Reports (now Annual Reports). This is a large workload and leaves little time to deal with strategic issues and planning. As there will be no major review of NP in 2011, STECF recommends that a SGRN working group be convened early in 2011 to discuss strategic issues over the medium to long term (next five years). The issues relate to data deficiencies, revisions to Guidelines for submission of National Programmes and Annual reports; procedures for evaluation of NP and AR, revisions to the DCF; actions required following the review of surveys; the DCF and the Control Regulation; Regional Database issues; DCF Website; DCF Sharepoint. As concerns the DCF and the Control Regulation, there is no co-ordination at the EU level and in many cases not on the MS

¹ Task Group 1 Report Biological Diversity - EUR 24337 EN, Task Group 2 Report Non-indigenous Species -EUR 24342 EN, Task Group 3 Report Commercially exploited fish and shellfish - EUR 24316 EN, Task Group 4 Report Food Webs - EUR 24343 EN, Task Group 5 Report Eutrophication - EUR 24338 EN, Task Group 6 Seafloor Integrity - 24334 EN, Task Group 8 Report - Contaminants and Pollution Effects - EUR 24335 EN, Task Group 9 Report - Contaminants in Fish and Other Seafood - EUR 24339 EN, Task Group 10 Report - Marine Litter - EUR 24340 EN, Management Group Report - Scientific Support to the European Commission on the Marine Strategy Framework Directive - EUR 24336 EN

² Rätz H.J., Doerner H., Scott R. & Barbas T. (2010). Complementary roles of European and national institutions under the Common Fisheries Policy and the Marine Strategy Framework Directive. Marine Policy 34 (5): 1028-1035.

level either. STECF suggests that the ToRs for this meeting be developed in conjunction with the Commission in late 2010.

The working group recommends a working group, possibly followed up by a Study on identifying adequate methods for allocating economic data at different disaggregation levels (e.g. metiers). STECF agrees that there are significant difficulties in allocating fishing costs to different métiers when individual vessels operate in multiple métiers during the year or even during one day at sea, and supports this recommendation.

4. ANNEX I – REPORT OF SGRN-10-01

SGRN-10-01: Evaluation of the National Programmes for 2011 to 2013 and other DCF related issues

Ispra, Italy, 14th to 19th June 2010

This report does not necessarily reflect the view of the European Commission and in no way anticipates the Commission's future policy in this area

Errors using inadequate data are much less than those using no data at all.

Charles Babbage (1791 to 1871) Inventor, Philosopher and Engineer.

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ANNEX 6 – Comments made by STECF on SGRN 10-01 Report

(1) SGRN 10-01 met at the Hotel Casa Don Guanella, Ispra, Italy from 14th to 19th June 2010. The terms of reference and the agenda for the meeting are given in Annex 1 and Annex 2. The main business of the meeting was to evaluate the National Programmes for 2011 to 2013 submitted by Member States. Twenty One Member State's National Programmes were evaluated by a group of 23 independent experts. No National Programme was received from Greece.

(2) The independent experts were divided into four area based groups (biologists) and one economic group. The area based groups (North Atlantic; North Sea and Eastern Arctic; Baltic; Mediterranean and Black Sea) each reviewed 5-6 NP's (all biological aspects) while the economists reviewed all NP's in relation to economic variables, transversal variables and the aquaculture and processing sector. The evaluations of NP's were completed, but the workload on participants was great.

(3) SGRN is concerned that no progress has been made in developing a clear and digitally based evaluation process that includes a pre screening of NP's (see discussion SGRN 09-01). There were no specific guidelines on how to "evaluate" the new NP. SGRN developed a series of questions based on the guidelines for "submission" of NP's (SGRN 09-03). This took some time to develop during the meeting. Furthermore, SGRN have stressed the importance of a pre screening of NP's to make the meeting as efficient as possible. This did not take place and impacted the workload of the meeting. The templates used in the evaluation are given in the annexes of this report. The process is very labour intensive. There is a need to invest and develop a simple electronic version of the evaluation procedure that produces the required tables and summary information automatically. SGRN would stress that this investment would make the evaluation process more effective and efficient and that the issue needs to be addressed for future evaluations. SGRN consider that this issue should be a part of the Strategic discussions in early 2011.

(4) The overall results of the evaluation are presented in Table 1.1 at the end of this summary. The details of each NP evaluation are presented in Section 1 of this report. This section gives an overall summary and detailed comment for each NP. SGRN recognizes the tremendous efforts made by MS in compiling their multi-annual NP (2011 – 2013) in accordance with the new Guidelines (SGRN 09-03). Overall SGRN considers that MS have mostly complied with the new guidelines. In general, the NP's are well laid out, especially the content index. SGRN appreciates that MS provided the NP proposal in English. The specific comments and observations of SGRN in relation to the evaluations are given in Section 7 of this report.

(5) The comments and recommendations from the evaluations are given in Section 7 of this report. There are many good recommendations that will improve the overall process and many will be addressed in the revision of the Guidelines for the submission of NP. They will also be addressed in the development of new guidelines for the evaluation of NP and in the development of an electronic based evaluation tool to generate the tables and text required by SGRN.

(6) At their April 2010 plenary meeting, STECF stressed that the availability of high quality data collected under the DCF is of vital importance to STECF working groups

(Effort, Annual Economic Report etc.) and highlighted the existing problems with data deficiencies. SGRN briefly discussed the response by Member States to the call for economic data in early 2010. There were clear data failures noted in this exercise. The economists at the meeting pointed out that a report from the JRC was being completed on this issue and that it would be available for the SGRN 10-02 meeting in July 2010. Therefore, SGRN concluded that this issue was more appropriate to the July SGRN review of the Technical Reports, supplemented with the JRC report. It will also be addressed at a planned SGRN strategic meeting in early 2011 (see summary point 13)

(7) STECF have noted that the provision of data that is funded under the DCF is proving a problem for STECF, particularly in relation to economic and effort data. STECF stated that in principle, there should be no discrepancies in data and stressed the need for appropriate quality checks on all fisheries data used in support of fisheries management advice. Such discrepancies not only impact on the quality of assessment and advice, but also affect the distribution of sampling effort declared and carried out under the DCF. SGRN considered that the issue of data discrepancies was more appropriate to review of the DCF Technical Reports that would be carried out at SGRN 10-02 in July 2010. As part of this review of MS Technical Reports, ICES will present the meeting with a database of the various DCF data sets made available for stock assessment and time permitting, this template and procedure for reporting data deficiencies by data end users (i.e. ICES) could be further developed.

(8) The Commission updated SGRN on progress in relation to the review of surveys to be undertaken in 2010. The RCM's reviewed the survey list provided by ICES and added the additional information which SGRN 09-04 sought. A chair will be appointed shortly and the collation of information in relation to surveys is almost complete. In general, the overall roadmap outlined in SGRN 09-04 is being followed and is on schedule.

(9) SGRN has been asked by STECF (April 2010 Plenary) to address the collection of data under the MSFD. SGRN would point out that the data collected under the DCF framework, particularly under the scheme for research surveys at sea, (Council Regulation (EC) No 199/2008) can contribute to the development of indicators that address some of the descriptors in Annex 1 of the MSFD. The Ecosystem Approach to the management of human activities is a cornerstone of both the CFP and the MSFD. In order to further explore how the DCF can assist the MSFD, SGRN recommends that a Study Group on DCF data and the MSFD (SGDCMS) be established and meet in early 2011. Participants should consist of a mix of MSFD and DCF experts. A proposed terms of reference of this study group are;

- (1) to examine the descriptors listed in Annex 1 of the MSFD with their associated indicators and data requirements
- (2) to examine how the current data collected under the DCF could be used to generate indicators for the MSFD descriptors. The DCF data sets should be confined to those generated from at sea surveys.
- (3) to examine if new data sets could be collected under the DCF and used to generate indicators for the MSFD descriptors. The proposed new data sets should be confined to those generated from at sea surveys under the DCF.

(10) SGRN briefly discussed the current status of the Regional Database (RDB) issue. The RDB meeting proposed by SGRN 09-04 took place in Brussels in February 2010. The various Regional Coordination Meetings (RCM's) have reviewed this report during their April-May 2010 meetings. The RCM Baltic agreed to use FishFrame as a RDB.

The RCM NS&EA have agreed to use a disaggregated RDB. The RCM Med&BS considers that no RDB is necessary and that there are existing survey data bases in use and that data from JRC data calls should be accessible. The RCM LDF noted that databases are available from ICCAT and other relevant RFMO's. At the RCM NA, a RDB steering Group was proposed. SGRN supports this proposal and considers that this group should deal with the Baltic, NS&EA, and the NA regions, as the majority of the requirements of a RDB are pan European. The level of implementation will differ between regions.

(11) SGRN reviewed the schedule of meetings carried out in 2010 so far. SGRN expressed concerns on the scheduling of many DCF related meetings during the first part of 2010. The first 6 months of 2010 has been very busy for the DCF community. MS compiled new NP for 2011 to 2013 under new Guidelines by 31st March and the 2009 Technical Report by 31st May. The RCM meetings were conducted over the period April/May which gave little time for the preparation and circulation of reports to MS for Revision of their NP by 31st May. The LM meeting was held in early June and some RCM reports were not available for consideration by the meeting. SGRN 10-01 (Review of NP) took place two weeks before SGRN 10-02 (Review of Technical Reports). SGRN recommends that meeting scheduling should be optimally spaced during the year to allow for the timely production of the relevant reports for follow up action by MS and other groups.

(12) SGRN examined the main recommendations from the SGRN 09-04 report and noted that most recommendations had been followed up. The regional data Base and review of surveys is progressing well in 2010. MS have in general followed the NP guidelines. However some economic issues remain to be resolved. The participation of economists in RCM's remains an issue. The data deficiencies in relation to the AER will be addressed by SGRN 10-02 in July. SGRN strongly recommends a Workshop and/or followed up by a Study on identifying adequate methods on allocating economic data at different disaggregation levels (e.g. metiers).

(13) SGRN considers strategic planning a very important element of it's work programme. The SGRN meetings which are devoted to NP and TR reviews carry a great workload and there is little time to deal with strategic issues and planning. As there will be no major review of NP in 2011, SGRN recommends that it meet in early 2011 in Brussels to discuss strategic planning issues over the medium to long term (next five years). The issues relate to Data Deficiencies, Revisions to Guideline for submission of NP; procedures for evaluation of NP and TR, revisions to the DCF; actions required following the review of surveys; Regional data Base Issues; Website; Sharepoint. The TOR's for this meeting will be developed in late 2010 with the Commission.

(15) SGRN notes that no sharepoint facilities were available for the meeting. The RCM meetings have established a sharepoint facility through the ICES website. This has greatly facilitated the work of the RCM's. SGRN recommends that a sharepoint facility be established to assist the work of SGRN.

(16) CHAIRS COMMENT: The draft SGRN 10-01 report was compiled and presented to the 34th STECF Plenary (STECF 10-02) in July 2010. The comments and recommendations of STECF in relation to this report are presented in Annex 6.

 TABLE 1.1 :
 Summary of SGRN evaluations of MS NP 2011 to 2013. NO = < 10%;</td>
 PARTLY = 10-50%;
 MOSTLY = 50-90%;
 YES = > 90%

 Score Key represent combined economic and biological evaluations.
 (NOTE: No NP Received from Greece)

				Questions	1 to 9 with S	Score Keys (S	See Notes be	elow Table)		
NUMBER	COUNTRY	1	2	3	4	5	6	7	8	9
1	BELGIUM	Р	Y	Y	Y	Y	Y	Y	Р	Р
2	BULGARIA	М	Y	Y	Y	Y	Y	Y	М	М
3	MALTA	М	Y	Y	Y	Y	Y	Y	М	М
4	DENMARK	М	Y	Y	Y	Y	Y	Y	М	М
5	ESTONIA	Р	Y	Y	Y	Y	Y	Y	Р	Р
6	FINLAND	M	Y	Y	Y	Y	Y	Y	М	М
7	FRANCE	М	Y	N	Y	Y	Y	М	М	М
8	GERMANY	М	Y	Y	Y	Y	Y	Y	М	М
9	GREECE *									
10	IRELAND	М	Y	Y	Y	Y	Y	Y	М	М
11	ITALY	М	Y	Y	Y	Y	Y	Y	М	М
12	LATVIA	М	Y	Y	Y	Y	Y	Y	М	М
13	LITHUNIA	M	Y	Y	Y	М	Y	Y	М	М
14	MALTA	М	Y	Y	Y	Y	Y	Y	М	М
15	NETHERLANDS	M	Y	Y	Y	Y	Y	Y	М	М
16	POLAND	М	Y	Y	Y	Y	Y	Y	М	М
17	PORTUGAL	М	Y	Y	Y	Y	Р	N	М	М
18	ROMANIA	М	Y	Y	Y	Y	Y	М	М	М
19	SLOVENIA	Р	Y	Y	Y	Y	Y	Y	М	Р
20	SPAIN	N	Y	Y	Y	Y	М	М	N	N
21	SWEDEN	Y	Y	Y	Y	Y	Y	Y	М	Y
22	UK	М	Y	Y	Y	Y	Y	Y	М	М

From Article 4; Council Regulation 199/2008

Question 1 Was the NP drawn up in accordance with the Community Programme ?

Question 2 Did the NP include a multiannual sampling programme ?

Question 3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?

Question 4 Did the NP include a scheme for the management and use of data for scientific analyses purposes ?

Question 5 Did the NP include a scheme for the management and use of data for scientific analyses purposes ?

From Article 5 Council Regulation 199/2008

 Question 6
 Did the MS coordinate their NP with other MS in the sub marine region and did the MS make every effort to coordinate their actions with third countries having sovereignty or jurisdiction over waters in the same marine region ?

 Question 7
 Did the MS take into account the recommendatons made by the RCM's

From the SGRN 09-03 Guidelines

Question 8 Did the MS follow the SGRN 09-03 Guidelines ?

Question 9 Did the NP allow SGRN to evaluate what is planned by the MS ?

KEY

YES = Y Mostly = M Partly =

Ρ

No = N

INTRODUCTION

SGRN 10-01 met at the Hotel Casa Don Guanella, Ispra, Italy from 14th to 19th June 2010. The terms of reference and the agenda for the meeting are given in Annex 1 and Annex 2. The main business of the meeting was to evaluate the National Programmes for 2011 to 2013 submitted by Member States under the new guidelines (SGRN 09-03).

The Guidelines (SGRN 09-03) for the submission of National Programme Proposals under the framework Council Regulation (EC) 199/2008, and implementing Commission Regulation (EC) 665/2008 and Commission Decision 2008/949/EC (the 'Data Collection Framework' or DCF), are intended to help Member States (MS) in producing National Programme Proposals (NP Proposals) that contain all the necessary information for their discussion and coordination in the RCMs and subsequent evaluation by the Sub-group on Research Needs (SGRN) of the Scientific, Technical and Economic Committee on Fisheries (STECF) and the European Commission (EC).

The present 2009 version of the Guidelines is based on a review of the Guidelines established by the expert group SGRN-08-01 (Nantes, 2-6 June 2008) and finalised by SGRN-09-03 (Ispra, October 2009). These Guidelines were used for the first time in the submission of the NP Proposals for 2011-2013. The Guidelines will be reviewed and updated at intervals by SGRN. New versions of the Guidelines will always be published as stand-alone documents.

Following the provisions of the DCF, the deadline for the submission of the NP Proposals 2011-2013 was 31st **March 2010**. MS were urged to scrupulously respect this deadline. Delays in submission may lead to reductions in the financial assistance (Reg. 199/2008 Article 8, 5.(a); Reg. 665/2008, Article 6(1)). In addition, this may prevent evaluation of the overdue NP Proposals by SGRN, and delay the final approval and financial assistance by the EC.

The NP Proposals 2011-2013 will be evaluated by SGRN based on their conformity and the scientific relevance of the data to be covered and also the quality of the proposed methods and procedures (Article 6 of Reg. 199/2008). SGRN's conclusions and recommendations will be laid down in this report, for subsequent endorsement by STECF and further consideration by the EC.

SGRN stress that regarding the submission of the NP proposals and TRs, Articles 2 and 5 of Commission Regulation 665/2008 clearly stipulate that MSs have the obligation to use the guidelines and templates established by STECF.

The primary aim of the NP Proposals is to allow SGRN and STECF to evaluate:

- What has been planned by MS to meet the requirements of the DCF;
- The methods that will be used to collect the data;
- The soundness of the derogations requested, and the reasons for any nonconformity in the NP Proposals with the provisions of the DCF.

The NP Proposals should particularly address the above aspects of the data collection programmes, in a brief but sufficiently comprehensive way. Descriptions of sampling

schemes and methodological aspects should contain the minimum sufficient information required for SGRN to evaluate the appropriateness of the methods used. Any detailed information may be provided as an annex of the NP proposal, following the same structure as suggested by the guidelines.

Derogations and non-conformities

The DCF has several formal provisions for derogation, where metiers can be excluded from sampling for length (based on a ranking system) or where stocks can be exempted from the obligation to collect samples for stock-related variables, if a MS's landings are below certain thresholds. Whenever these exemption rules are applied, it should clearly be stated and documented in the relevant sections of the NP Proposal and under 'List of derogations'.

There may however, be other reasons for a MS to ask for a derogation or to justify a nonconformity between its planned data collection activities and the requirements of the DCF. All such requests should be fully documented and explained in the relevant sections of the NP Proposal. Derogations and non-conformities that are most likely to be accepted by SGRN and endorsed by STECF are those which are in accord with:

- A formal recommendation by an external expert group (e.g. ICES and other acknowledged planning groups on fishery-independent surveys, market and discard sampling, etc.).
- A formal recommendation by a Regional Coordination Meeting (RCM).
- A bilateral agreement between MS on task sharing in relation to certain aspects of the
- DCF (e.g. sampling of foreign flag vessels, joint sampling programmes for agelength keys or other stock-related variables, etc.).
- A former, unconditional approval of a similar request for derogation, or a non conformity, by SGRN, STECF or the Commission.

Should this be the case, then a verbatim transcript of the supporting recommendation / section of the agreement / approval should be included in the NP Proposal (preferably in quotes "..." and in italic), together with a reference to the document where the relevant background information can be found. As an alternative, bilateral agreements may also just be referred to in the text and included as an annex to the NP Proposal.

Regional co-ordination

Regional coordination and cooperation between Member States was developed during the former period of the DCF and is now fully integrated in the general framework (Article 5 of Reg. 199/2008). The Regional Coordination Meetings (RCMs) are established to improve the overall quality of the data collected in support of the CFP, through task and cost sharing, data pooling and, in general, all bilateral, regional and pan-European initiatives that can help increasing the accuracy, effectiveness and cost efficiency of data collection. It is further envisaged to invite representatives from third countries to the relevant RCM, e.g. Norway for the North Sea & Eastern Arctic region. The elements of regional co-ordination shall be given in the relevant NP Proposal sections. MS are expected to participate in the following Regional Coordination Meetings following the RCM areas of competences in force in 2009 :

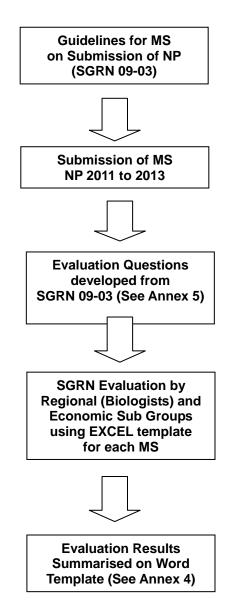
Many Member States operate in more than one marine area. The table below outlines the marine areas in which the various member states operate. This has implications for the review of National Programmes. The biological evaluation of the NP must evaluate separately each area

MS	Baltic Sea	North Sea & East Arctic	North Atlantic	Mediterranean & black Sea	Other Regions
Belgium	•	Х	Х		
Bulgaria				Х	
Cyprus				Х	Х
Denmark	Х	Х			
Estonia	Х		Х		
Finland	Х				
France		Х	Х	Х	Х
Germany	Х	Х	Х		Х
Greece				Х	Х
Ireland			Х		
Italy				Х	Х
Latvia	Х		Х		
Lithuania	Х	Х			Х
Malta				Х	Х
Netherlands		Х	Х		Х
Poland	Х		Х		
Portugal		Х	Х		Х
Romania				Х	
Slovenia				Х	
Spain		Х	Х	Х	Х
Sweden	Х	Х			
United Kingdom		Х	Х		

the Member State operates in. On the other hand, the economic evaluation considers all areas as a "supra region".

General Approach to Evaluation of NP

In February 2009, SGRN 09-03 highlighted the fact that there were no guidelines for the submission and evaluation of NP. Since then, guidelines for the submission of NP have been developed (SGRN 09-03). There are still no formal guidelines for the evaluation of NP. This meeting developed an approach based on the questions from the SGRN 09-03 guidelines. A set of module specific questions were developed and these are given in Annex 5 of this report. Each NP was evaluated using these questions. The results of the evaluation were then presented in a table format (annex 4) which gave a brief summary of the NP and then gave detailed comment of the NP. A schematic of the evaluation process is given below (further details are given in Section 1).



Follow up to the Main SGRN 09-04 Recommendations

SGRN examined the main recommendations from the SGRN 09-04 report and noted that most recommendations had been followed up. The regional data Base and review of surveys is progressing well in 2010. MS have in general followed the NP guidelines. However some economic issues remain to be addressed. The participation of economists in RCM's remains an issue. The data deficiencies in relation to the AER will be addressed by SGRN 10-02 in July. SGRN strongly recommends a Workshop and/or followed up by a Study on identifying adequate methods on allocating economic data at different disaggregation levels (e.g. metiers).

Participants

The SGRN 10-01 participants were;

Independent Experts;

Angeles Armesto Richard Bengtsberg Paolo Carpentieri Paul Connolly (Chair) Henrik Degel Mark Dimech Michael Ebling Ryszard Grzebielec Georges Kornilovs Emmanuil Koutrakis Ari Leskela Enrico Longoni Helen McCormick Arina Motova Vogg Lowe Nielsen Gheorghe Radu Tiit Raid Katja Ringdahl **Evelina Carmen Sabatella** Els Torreele Frans Van Beek Joel Vigneau Lucia Zarauz

EU Commission

Antonio Cervantes (EU Commission) Herwig Ranner (EU Commission) Angel Calvo (EU Commission) Jano Vitanen (JRC)

The contact details for the participants are given in Annex 3.

The following section gives the detailed results and comments of the SGRN independent experts evaluation of the 21 National Programmes received by the Commission for the period 2011 to 2013. No NP was received from Greece.

The evaluation format is divided into two parts. Part 1 consists of a series of 9 questions which are based on Article 4 and 5 of Council Regulation 199/2008 and the Guidelines (SGRN 09-03). SGRN have given a general scores for each question to signify how the NP performed in relation to these questions (YES = > 90%; Mostly 50-90%; Partly = 10-50%; NO= <10%). It should be emphasised here that the responses represent a general overview from the biologists and economists. Part 1 also contains some general comments in relation to the NP. The objective of Part 1 is to give the Commission a general overview of the NP and to highlight any issues which need attention.

A summary table is given for the evaluation results of part 1.

Part 2 consists of specific comments on the NP module by module. It gives the major issues in the NP's that need to be addresses by the Member States. It should be emphasised here that the biological comments are "area based" and that the economic comments are at the "supra regional" basis.

TABLE 1.1 : Summary of SGRN evaluations of MS NP 2011 to 2013. NO = < 10%;</td> PARTLY = 10-50%; MOSTLY = 50-90%; YES = > 90% Score Key represent combined economic and biological evaluations. (NOTE: No NP Received from Greece)

				Questions	1 to 9 with S	Score Keys (See Notes be	elow Table)		
NUMBER	COUNTRY	1	2	3	4	5	6	7	8	9
1	BELGIUM	Р	Y	Y	Y	Y	Y	Y	Р	Р
2	BULGARIA	М	Y	Y	Y	Y	Y	Y	М	М
3	MALTA	М	Y	Y	Y	Y	Y	Y	М	М
4	DENMARK	М	Y	Y	Y	Y	Y	Y	М	М
5	ESTONIA	Р	Y	Y	Y	Y	Y	Y	Р	Р
6	FINLAND	М	Y	Y	Y	Y	Y	Y	М	М
7	FRANCE	М	Y	N	Y	Y	Y	M	М	М
8	GERMANY	М	Y	Y	Y	Y	Y	Y	М	М
9	GREECE *									
10	IRELAND	М	Y	Y	Y	Y	Y	Y	М	М
11	ITALY	М	Y	Y	Y	Y	Y	Y	М	М
12	LATVIA	М	Y	Y	Y	Y	Y	Y	М	М
13	LITHUNIA	М	Y	Y	Y	М	Y	Y	М	М
14	MALTA	М	Y	Y	Y	Y	Y	Y	М	М
15	NETHERLANDS	М	Y	Y	Y	Y	Y	Y	М	М
16	POLAND	М	Y	Y	Y	Y	Y	Y	М	М
17	PORTUGAL	М	Y	Y	Y	Y	Р	N	М	М
18	ROMANIA	М	Y	Y	Y	Y	Y	М	М	М
19	SLOVENIA	Р	Y	Y	Y	Y	Y	Y	М	Р
20	SPAIN	N	Y	Y	Y	Y	М	M	N	N
21	SWEDEN	Y	Y	Y	Y	Y	Y	Y	М	Y
22	UK	М	Y	Y	Y	Y	Y	Y	М	М

From Article 4; Council Regulation 199/2008

Question 1 Was the NP drawn up in accordance with the Community Programme ?

Question 2 Did the NP include a multiannual sampling programme ?

Question 3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?

Question 4 Did the NP include a scheme for the management and use of data for scientific analyses purposes ?

Question 5 Did the NP include a scheme for the management and use of data for scientific analyses purposes ?

From Article 5 Council Regulation 199/2008

Question 6 Did the MS coordinate their NP with other MS in the sub marine region and did the MS make every effort to coordinate

their actions with third countries having sovereignty or jurisdiction over waters in the same marine region ?

Question 7 Did the MS take into account the recommendatons made by the RCM's

YES = Y

From the SGRN 09-03 Guidelines

Question 8 Did the MS follow the SGRN 09-03 Guidelines ?

 $\label{eq:Question 9} \quad \mbox{Did the NP allow SGRN to evaluate what is planned by the MS ?}$

KEY

Mostly = M Partly =

No = N

Ρ

1.1 MEMBER STATE : BELGIUM PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Partly
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over waters in the same marine regions.	
7 Did MS take into account the recommendations made by RCM's	Yes
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Partly
9 Did the NP allow SGRN to evaluate what is planned by the	Partly
MS ?	i antij
10 Overall Comments by SGRN on NP	
(a) Overall the NP is very good, following the guidelines and allowing evaluating what is planned.	
(b) There are two derogations requested, one on the discards of the Crangon fishery (not justified in the past) and another one on the sampling of length and age of eel (not justified since eel is under a recovery plan).	
(c) An Eel pilot study for monitoring inland fisheries is included in the NP and it is stated that the programme will be carried out only if it is eligible under the DCF. The proposed study does not cover biological stock parameters, thus it is not eligible under the DCF. SGRN however is of the opinion that the state of the eel stock justifies the collection of biological parameters to be carried out by Belgium.	
(d) As regards the recreational fisheries initial steps were taken by the MS, but more details are needed in the methodology and the description of the proposed project.	
(e) Overall SGRN feels that Belgium has partly complied with guidelines regarding the description of the collection of economic fleet variables. Further information on methodology on applied needs to be provided.	

PART 2 – SPECIFIC COMMENTS BY SGRN ON NP

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the guidelines
II Organisation of NP	SGRN considers this section as mostly following the guidelines The modules that each partner is involved should be
	mentioned shortly in the presentation of each partner. Moreover it should clarified that the National Correspondent participates in the RCM, as indicated in the guidelines.
	SGRN asks the MS to provide this information
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	SGRN considers that MS has followed the guidelines
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to provide more information regarding methodology of data collection. No information about target and frame population and sample number presented. MS is asked to provide this information. Segments are not named in accordance with DCF. MS is asked to clarify this issue.
III.B.2 Estimation	MS is asked to provide information on estimation techniques in accordance with the guidelines
III.B.3 Data Quality Evaluation	MS is asked to clarify the methods used to ensure quality of the data in the case of high non-response rates in the case of census. Table III.B.3. MS is asked to name supra-regions in accordance with DCF. The type of data collection scheme and accuracy indicators must be in accordance with DCF. MS is asked to provide information on data collection scheme for 2011 and 2012. MS is asked to provide explanations of footnotes where footnotes are used.
III.B.4 Data Presentation	MS is asked to clarify when the data is going to be available
III.B.5 Regional Co-ordination	No Comments
III.B.6 Derogations and Non Conformities	No Comments

III.C Biological – Metier Related Variables	North Sea & Eastern Arctic
III.C.1 Data Acquisition III.C.2 Estimation Procedure III.C.3 Data Quality evaluation	SGRN considers this section as mostly following the guidelines The fishing grounds used are not in agreement with the ones agreed by the Liaison meeting SGRN asks MS to update the fishing grounds in Table III.C.1 and III.C.2 SGRN considers that MS has followed the guidelines SGRN considers this section as mostly following the guidelines There are no potential sources of bias identified. SGRN asks MS to provide more information on the potential sources of bias
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines SGRN considers that MS has partly followed the guidelines There is a derogation requested on the discards of the Crangon fishery (III.C.1) which should be mentioned in III.C.6) and another one on the sampling of length and age of eel. The derogation on eel is not justified since eel is under a recovery plan.
	SGRN does not accepts the justification for the derogation for not sampling discards in the Crangon fisheries. The métier TBB_CRU_16-31_0-0 (Crangon crangon fisheries) is ranked at regional level. Therefore MS can seek a bilateral agreement with other MS of which sampling effort is present at regionally ranked level. MS active in this métier are The Netherlands, Germany and Denmark.
III.C Biological – Metier Related Variables	North-East Atlantic
III.C.1 Data Acquisition	SGRN considers this section as mostly following the guidelines Fishing grounds used in tables III.C do not correspond with those defined in the RCM NA Merging of metiers is done between the same métier when

	· · · · · · · · · · · · · · · · · · ·
	it operates in areas corresponding to the same fishing ground. These should be the same métier from the beginning (valid for both the selection of metiers to sample and sampling stratification)
	A clarification on the sampling coverage of small scale vessels is missing.
	MS should explain why the sampling strategy is described by stock and not by metier
III.C.2 Estimation Procedure	SGRN considers this section as mostly following the guidelines
	Only discards estimation procedures are described, and use of COST tools.
III.C.3 Data Quality evaluation	SGRN considers this section as mostly following the guidelines
	Only use of COST tools is mentioned. Some descriptions in the 'Type of data collection' refer to quality evaluation. Potential sources of bias are not identified.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers this section as partly following the guidelines
	No specific mention of co-ordination of sampling programs with other MS is mentioned, even though it is outlined clearly in the bi-lateral agreement with the UK. No list of RCM recommendations with brief description and responsive actions is included.
III.C.6 Derogation and Non Conformities	There is a derogation requested on sampling of length and age of eel, which is not justified, since eel is under a recovery plan.
III.D Biological – Recreational Fisheries	North Sea - Eastern Arctic & North-East Atlantic
III.D.1 Data Acquisition	SGRN considers this section as partly following the guidelines
	Nothing is mentioned about sharks which are one of the species of the recreational fishery that should be mentioned in the NP's of NS, even though there is no recreational fishery of sharks in Belgium.
	In the NP there is a description of a sub sample used to test the questionnaire proposed but there is no description on how the questionnaire will be used on the frame sample.
	The NP mentions that the target population is all persons

	with a valid license at the time of the pilot study, but it has no reference to the frame population.
	The reference to the data source is not in the right place.
	The sampling protocol is not described adequately.
	SGRN asks MS to supply the missing information.
III.D.2 Estimation Procedures	The methodology for the estimation of the population that is going to be estimated is missing
III.D.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines
	The methodology is not described adequately.
	SGRN asks MS to give a more comprehensive description
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.D.6 Derogations and Non Conformities	Not relevant
III.E Biological – Stock Related Variables	North Sea & Eastern Arctic
III.E Biological – Stock Related	North Sea & Eastern Arctic SGRN considers this section as mostly following the guidelines
III.E Biological – Stock Related Variables	SGRN considers this section as mostly following the guidelines Weight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table
III.E Biological – Stock Related Variables	SGRN considers this section as mostly following the guidelines Weight measurements are missing for Merluccius
III.E Biological – Stock Related Variables	SGRN considers this section as mostly following the guidelines Weight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table IIIE2. Moreover sex ration is missing for most species (apart
III.E Biological – Stock Related Variables	SGRN considers this section as mostly following the guidelines Weight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table IIIE2. Moreover sex ration is missing for most species (apart Pleuronectes platessa, Solea solea, Psetta maxima). SGRN asks MS to update the Table III.E.2 with the missing
III.E Biological – Stock Related Variables III.E.1 Data Acquisition	SGRN considers this section as mostly following the guidelinesWeight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table IIIE2. Moreover sex ration is missing for most species (apart Pleuronectes platessa, Solea solea, Psetta maxima).SGRN asks MS to update the Table III.E.2 with the missing informationSGRN considers that MS has followed the guidelines[SGRN considers this section as mostly following the guidelines
III.E Biological – Stock Related Variables III.E.1 Data Acquisition III.E.2 Estimation Procedures III.E.3 Data Quality Evaluation	SGRN considers this section as mostly following the guidelines Weight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table IIIE2. Moreover sex ration is missing for most species (apart Pleuronectes platessa, Solea solea, Psetta maxima). SGRN asks MS to update the Table III.E.2 with the missing information SGRN considers that MS has followed the guidelines [SGRN considers this section as mostly following the guidelines There are no potential sources of bias identified
III.E Biological – Stock Related Variables III.E.1 Data Acquisition III.E.2 Estimation Procedures	SGRN considers this section as mostly following the guidelinesWeight measurements are missing for Merluccius merluccius, Lophius budegassa and L. piscatorius in Table IIIE2. Moreover sex ration is missing for most species (apart Pleuronectes platessa, Solea solea, Psetta maxima).SGRN asks MS to update the Table III.E.2 with the missing informationSGRN considers that MS has followed the guidelines[SGRN considers this section as mostly following the guidelines

III.E.5 Regional Co-ordination	guidelines
	There is no list of RCM recommendations with brief description and responsive actions included in the NP.
	SGRN asks MS to provide an updated list of the recommendations with the responsive actions.
	An Eel pilot study for monitoring inland fisheries is included in the NP, which needs collaboration with the Wallony region and other countries, and it is stated that the programme will be carried out only if it is eligible under the DCF. The proposed study does not cover biological stock parameters and does not belong in this section.
	SGRN is of the opinion that the state of the eel stock justifies the collection of biological parameters to be carried out by Belgium.
III.E.6. Derogations and Non Conformities	There is a derogation requested on sampling of biological parameters of eel which is not justified since eel is under a recovery plan.
III.E Biological – Stock Related Variables	North-East Atlantic
valiables	
III.E.1 Data Acquisition	SGRN considers this section as mostly following the guidelines
	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region
	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region naming in Tables III.E.2 and III.E.3. SGRN asks the MS to update the tables III.E.1, III.E2 and
III.E.1 Data Acquisition	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region naming in Tables III.E.2 and III.E.3. SGRN asks the MS to update the tables III.E.1, III.E2 and III.E.3. SGRN considers this section as mostly following the
III.E.1 Data Acquisition	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region naming in Tables III.E.2 and III.E.3. SGRN asks the MS to update the tables III.E.1, III.E2 and III.E.3. SGRN considers this section as mostly following the guidelines
III.E.1 Data Acquisition	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region naming in Tables III.E.2 and III.E.3. SGRN asks the MS to update the tables III.E.1, III.E2 and III.E.3. SGRN considers this section as mostly following the guidelines Only part of stock is being covered.
III.E.1 Data Acquisition III.E.2 Estimation Procedures	guidelines There is inconsistency between tables. Regions in column C should be the same as in Table III.E.1. Different region naming in Tables III.E.2 and III.E.3. SGRN asks the MS to update the tables III.E.1, III.E2 and III.E.3. SGRN considers this section as mostly following the guidelines Only part of stock is being covered. SGRN asks MS to give information of whole stock SGRN considers this section as partly following the

III.E.5 Regional Co-ordination	SGRN considers this section as partly following the guidelines
	MS should list clearly all co-ordination with other member states and state whether there is a bi lateral agreement in place. Moreover RCM recommendations are not mentioned.
	SGRN asks MS to provide the list with the relevant RCM recommendations
III.E.6 Derogations and Non Conformities	See North Sea & East Arctic
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No Comments
III.F.2 Effort	The type of data collection scheme and variability indicators must be in accordance with DCF. Not all parameters are covered.
III.F.3 Landings	Restricted list of species is used
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines There are two eel surveys included in the NP (glass eel and yellow eel survey) that are not included in the relevant table and it is not clear here whether financial contribution is requested for these surveys. However in section IIIE there is a description of the project and it is mentioned that financial contribution will be requested and the project will not be done if it is not eligible under DCF, which it isn't, since estimation of population density is not eligible.
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines

IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has partly complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	Even if the sector is small, the table IV A. 1 should reflect the knowledge about the sector. If no sampling is planned, it has to be indicated by "NS". MS is only mentioning Reg. 762/2008. MS has to clarify how to follow the provisions of Reg. 199/2008.
IV.A.2 Data Acquisition	MS has to provide a methodological report. MS has to clarify, if really all variables concerning DCF are collected.
IV.A.3 Estimation	Not applicable
IV.A.4 Data Quality	Not applicable
IV.A.5 Presentation	Not applicable
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines
IV.B.1 Data Acquisition	Table IV A. 2 has to be revised according to DCF. Belgium has to follow DCF and not STECF SGECA 06-01. A questionnaire could be given in an annex, but not in the text. The variables have to be according DCF regulation. Section has to be revised. Clarification needed on definition of financial cost MS has to clarify how the number of hours is collected and how the FTE (national) is calculated. MS has to provide a methodology how to calculate imputed value of unpaid labor MS should be aware that data are to be collected from enterprises belonging to NACE group 10.2. MS is asked to clarify whether "official accountants" or "official accounts" are used. MS are asked to clarify if really

	all enterprises have "official accountants resp. accounts".
IV.B.2 Estimation	MS has to provide methodology to derive final estimates from data collected for each variable Method has to be described in the NP how MS is going to estimate variables in the case of census and non-response
IV.B.3 Data Quality Evaluation	MS is asked to provide more detailed and clear information in the NP on methods to assess the variability of the estimates and bias MS should clarify the method used for assessing the quality of the data
IV.B.4 Data Presentation	MS are asked to clarify whether confidentiality problems are addressed
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformities	Not applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines
VI Module for the Management and Use of Data	SGRN considers this section as mostly following the guidelines]
	Information about the quality control and validation process of the primary and aggregated data is missing.
	SGRN asks MS to provide the missing information.
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
	Comments are directed to the Commission not to SGRN

XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.2 MEMBER STATE : BULGARIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	100
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
(a) The Bulgarian national proposal for the collection of fisheries is in general in accordance with EC 199/08 and Commission Decision 93/2010. SGRN appreciates the improvement that was done by member state taking into consideration that Bulgaria is one of the new member states and this is their second proposal for a national programme.	
(b) MS is encouraged to be involved more in international co- ordination and scientific meetings. Most of the problems encountered in the NP are due to a lack of participation in meetings and the relevant scientific discussions and agreements which are taken at international level both within the framework of the Data Collection, STECF and RFMOs (e.g. GFCM). This is especially relevant with respect to statistical procedures such as raising procedures and precision estimation for data quality.	
(c) MS should improve the data acquisition especially for those species (e.g. <i>Rapana venosa</i>) where a sampling program (métier sampling) does not exist and even tough these species constitute an important part of the national landings. MS is also reminded to conduct international surveys in line with agreed international protocols and procedures.	
(d) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of economic fleet variables. Further methodology needs to be provided regarding methods applied and the standard tables.	

PART 2 – SPECIFIC COMMENTS BY SGRN ON NP

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the guidelines
II Organisation of NP	SGRN considers that MS has followed the guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines
III.B.1 Data Acquisition	MS asked to clarify information provided and describe methodology used in more precise way. MS is asked to clarify what methodology is used to estimate the variables which are not clearly defined in the DCF. MS is asked to provide information about the date of reference year for the definition of population of fleet. MS is asked to provide information on vessels segmentation. MS is asked to provide more information and description of data sources used.
III.B.2 Estimation	MS is asked to provide further information on estimation techniques including formulas to derive final estimates.
III.B.3 Data Quality Evaluation	MS is asked to provide information in the text on estimation of variability and accuracy of the data collected
III.B.4 Data Presentation	MS is asked to clarify the reference years
III.B.5 Regional Co-ordination	No Comment
III.B.6 Derogations and Non Conformities	MS is asked to justify derogations
III.C Biological – Metier Related Variables	
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines Partly It is unclear if some of metiers (ex.small scale fisheries) are merged prior to the ranking. Some fisheries are described within the text but do not appear in the table III_C_1 (ex diving for Rapana venosa). MS to clarify. From the text in the report it is evident that Rapana venosa

	is of importance in Bulgarian fisheries. A metier targeting this species is not appearing in the tables. MS is reminded on the recommendation from the LM 2010 on sampling of metiers targeting only G3 species. A metier targeting Rapana venosa should have been picked up by the ranking system and need to be included in the NP. Length measurements needs to be done for the species. MS need to update. MS need to respect naming conventions at level 6 agreed on regional level. MS need to perform pilot or present a reference showing that discards are negligible before excluding metiers (FPN, LLS) from discard sampling The sampling frame code in the table is the same for all metiers despite very different types of fisheries. MS need to clarify if all metiers really are sampled with one frame. Sampling strategy should be consistent with III_C_3. MS to update
III.C.2 Estimation Procedure	MS to list all G1 and G2 species see also general comment SGRN considers that MS has followed the guidelines Partly MS need to describe how data is processed including raising procedures
III.C.3 Data Quality evaluation III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines Partly MS asked to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update Partly MS need to describe potential sources of bias in the sampling scheme
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	Derogations asked not to sample LLS and FPN for discards. SGRN suggest a pilot study (or any other reference) before eliminating metiers from discard sampling. MS need to include all metiers in the ranking (see comment table III_C_1).
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines Partly MS have to describe recreational fisheries only for bluefin tuna and eel. MS need to clarify if there are a recreational fishery for tuna and/or eel.
III.D.2 Estimation Procedures	NA
III.D.3 Data Quality Evaluation	NA
III.D.4 Data Presentation	NA
III.D.5 Regional Co-ordination	NA

III.D.6 Derogations and Non Conformities	NA
III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines Partly All sharks are not included in table III_E_1 neither are large pelagic fish. In the Black Sea only 2 EU MS are present. The share of EU landings between the two countries should add to 100%. This is not the case. MS to clarify this and update the table In table IIE3 the planned minimum number set at regional level must correspond between the black sea countries, for example the number of samples agreed at regional level for Psetta maxima do not correspond between countries. MS to update table
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines Partly Estimation procedures should be described for raising sampled data to landings and the estimation of precision levels. MS to update
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines Partly MS asked to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update
III.E.4 Regional Co-ordination	SGRN considers that MS has <i>not</i> followed the guidelines No MS to include list of relevant RCM recommendations
III.E.5 Derogations and Non Conformities	MS do not need to ask for a derogation for sampling Sarda sarda since the landings are well below 200 tonnes (exemption rules in 93/2010)
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No Comment
III.F.2 Effort	MS is asked to clarify the reference years. The standard Table III.F.1 is not filled in properly. MS has to provide variability indicators in the Standard Tables.
III.F.3 Landings	MS is asked to clarify the reference years.
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines Partly Mostly SGRN also notes that the survey for anchovy and horse mackerel is not eligible under DCF as the survey is not present under appendix IV of EC93/2010. MS should continue the pelagic survey in both quarters. MS need to update table

eIII.G.2 Modification in the Surveys	See comment on anchovy and horse mackarel survey. Surveys should further be conducted in 2nd and 4th quarter. September (as indicated in the table) is not acceptable. MS to update table. SGRN considers that MS has followed the guidelines Partly Partly MS want to make major modifications of the pelagic trawl survey such as changing target species and timing. This needs to be evaluated in the proper forum (MEDIAS WG). MS is free to propose new surveys but these are at the moment not eligible under DCF. MS should continue to the participate in the pelagic survey both quarter. MS should keep agreed names of surveys
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	See comment on modifications demanded
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.
Concerning Aquaculture IV.A.1 General Description of the	guidelines.
Concerning Aquaculture IV.A.1 General Description of the Aquaculture Sector	guidelines. No Comments MS is asked to fill in table IV.A.2 for all reference years. The reference year for life stock cost is one year behind for 2009. MS is asked to clarify. MS is asked to clarify how to ensure consistency of the data, especially if one source is collected anonymously. MS is asked to clarify the difference between the planned sample rate in table IV.A.2 and the proposed sample rate of
Concerning Aquaculture IV.A.1 General Description of the Aquaculture Sector IV.A.2 Data Acquisition	guidelines. No Comments MS is asked to fill in table IV.A.2 for all reference years. The reference year for life stock cost is one year behind for 2009. MS is asked to clarify. MS is asked to clarify how to ensure consistency of the data, especially if one source is collected anonymously. MS is asked to clarify the difference between the planned sample rate in table IV.A.2 and the proposed sample rate of 100% mentioned in the text.
Concerning Aquaculture IV.A.1 General Description of the Aquaculture Sector IV.A.2 Data Acquisition IV.A.3 Estimation	guidelines. No Comments MS is asked to fill in table IV.A.2 for all reference years. The reference year for life stock cost is one year behind for 2009. MS is asked to clarify. MS is asked to clarify how to ensure consistency of the data, especially if one source is collected anonymously. MS is asked to clarify the difference between the planned sample rate in table IV.A.2 and the proposed sample rate of 100% mentioned in the text. MS should consider non response. MS is asked to provide information on methods to assess

IV.A.7 derogation and Non Conformities	No Comments	
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has mostly complied with the guidelines.	
IV.B.1 Data Acquisition	MS is asked to fill in the table IV.B.2 for all reference years. Clarification needed. What is aquaculture processing? MS has to provide a methodology how to calculate the variable "imputed value of unpaid labour".	
IV.B.2 Estimation	MS should consider non response.	
IV.B.3 Data Quality Evaluation	MS is asked to provide information on methods to assess the variability of the estimates and bias and in general how to assess data quality.	
IV.B.4 Data Presentation	MS is asked to address confidentiality problems.	
IV.B.5 Regional Co-ordination	No Comments	
IV.B.6 Derogation and Non Conformities	For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. MS to address this in its NP.	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines Mostly MS should explain why the calculation of ecosystem indicator 6 is not reported in Table VI MS to justify how they calculate indicator 8 based on survey data	
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines	
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines	
VIII List of Derogations	SGRN considers that MS has followed the guidelines	
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines	

X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines however Statements on cost should be in a separate document.

1.3 MEMBER STATE : CYPRUS PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Mostly
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) The Operator estimates a few the collection of the series is	
(a) The Cypriot national proposal for the collection of fisheries is	
in general in accordance with EC 199/08 and Commission	
Decision 93/2010. The proposal is well written, comprehensive	
and in line with the guidelines. The NP is of a high quality MS is	
encouraged to maintain the progress done since its implementation in 2005.	
Implementation in 2005.	
(b)SGRN notes that MS has decreased its participation in	
international co-ordination and scientific meetings and this may	
effect negatively the implementation of the fisheries data	
collection program.	
(c) Overall SGRN feels that the MS has mostly complied with	
the guidelines regarding the description of the collection of	
economic fleet variables. Further information on FTE, inactive	
vessels, the target population and data quality evaluation needs	
to be provided.	

SECTION - MODULE	MAJOR SGRN COMMENT	
I General Framework	SGRN considers that MS has followed the guidelines	
II Organisation of NP	SGRN considers that MS has followed the guidelines	
III Module on the Evaluation of the Fishing Sector		
III.A General Description of the Fishing Sector		
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines.	
III.B.1 Data Acquisition	MS is asked to provide information on the method used to estimate FTE National.	
	MS stratification method is not consistent with DCF segmentation of the fleet, thus	
	MS needs to comply to it. MS is asked to provide further information on how they define the sample rate.	
III.B.2 Estimation	No special comments.	
III.B.3 Data Quality Evaluation	MS is asked to provide detailed information on the methods used to calculate measures of data variability and to explain better data quality issues.	
III.B.4 Data Presentation	MS is required to provide information on reference year and timing of data availability.	
III.B.5 Regional Co-ordination	No special comments.	
III.B.6 Derogations and Non Conformities	No special comments.	
III.C Biological – Metier Related Variables		
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly MS should list all G1 and G2 species, including sharks. For metier based sampling all encountered G1 and G2 species need to be measured for length. See general comment MS to update table.	

SGRN considers that MS has followed the guidelines	
SGRN considers that MS has followed the guidelines	
See general comment on availability of data for end- users. Data should be available end of May	
SGRN considers that MS has followed the guidelines	
Cyprus ask for a derogation to sample bottom trawls in GSA 26 and 27 for discards. These metiers have a very limited activity (91 and 18 effort days during reference period) and are not picked by the ranking system. SGRN considers the justification for a derogation acceptable.	
MS have no recreational fishery for eel. There are however nowadays a recreational fishery for BFT. MS have had a derogation to sample recreational fishery for BFT earlier (2005 onwards) but want to perform a pilot study since the recreational fishery seem to have increased. SGRN support the idea of a pilot study. Future actions on the need of sampling recreational fisheries for BFT should be based on the pilot study.	
SGRN considers that MS has followed the guidelines	
SGRN considers that MS has followed the guidelines	
SGRN considers that MS has followed the guidelines	
No regional coordination on recreational fisheries within the region	
Justification for derogation from sampling eel is considered acceptable	
SGRN considers that MS has followed the guidelines	
SGRN considers that MS has followed the guidelines	

III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines	
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines	
III.E.5 Derogations and Non Conformities	All asked derogations are already covered by the exemption rules in 93/2010. MS do not have to sample these species	
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines.	
III.F.1 Capacity	No special comments.	
III.F.2 Effort	MS stratification method is not consistent with DCF segmentation of the fleet, thus MS needs to comply to it.	
	MS is asked to provide information on the method used to assess the quality of the data.	
	MS is asked to clearly specify when data will be available for each year included in the program.	
III.F.3 Landings	MS is asked to provide information on the method used to assess the quality of the data.	
	MS is asked to clearly specify when data will be available for each year included in the program.	
III.G Research Surveys at Sea		
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines	
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines	
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines	
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines	
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry		

IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.	
IV.A.1 General Description of the Aquaculture Sector	Trout and other species are mentioned in the text but n shown in the table. MS should clarify. Interest rates concerning financial costs should be assessed for the specific situation in the aquaculture sector.	
IV.A.2 Data Acquisition		
IV.A.3 Estimation	MS should consider different enterprise sizes. If this is the case, the method is not scientifically adequate.	
IV.A.4 Data quality	MS may look at achieved response rate and not only at targeted. MS is asked to provide information on methods to assess the variability of the estimates and bias.	
IV.A.5 Presentation	MS is asked to address confidentiality problems.	
IV.A.6 Regional Co-ordination	No Comment	
IV.A.7 derogation and Non Conformities	Justified as long as the quantities of other species are so low.	
	SGRN feel that MS has mostly complied with the guidelines.	
IV.B collection of data Concerning the Processing Industry		
the Processing Industry	guidelines. The type of error shall be bias, response rate is the accuracy indicator. MS has to change it in the table	
the Processing Industry IV.B.1 Data Acquisition	guidelines. The type of error shall be bias, response rate is the accuracy indicator. MS has to change it in the table IV.B.2. MS should consider different enterprise sizes. If this is the case, the method to derive final estimates is not scientifically adequate.	
the Processing Industry IV.B.1 Data Acquisition IV.B.2 Estimation	guidelines. The type of error shall be bias, response rate is the accuracy indicator. MS has to change it in the table IV.B.2. MS should consider different enterprise sizes. If this is the case, the method to derive final estimates is not scientifically adequate. MS should consider non response. MS is asked to provide information on methods to assess the variability of the estimates and bias and in general	
the Processing Industry IV.B.1 Data Acquisition IV.B.2 Estimation IV.B.3 Data Quality Evaluation	guidelines. The type of error shall be bias, response rate is the accuracy indicator. MS has to change it in the table IV.B.2. MS should consider different enterprise sizes. If this is the case, the method to derive final estimates is not scientifically adequate. MS should consider non response. MS is asked to provide information on methods to assess the variability of the estimates and bias and in general how to assess data quality.	
the Processing Industry IV.B.1 Data Acquisition IV.B.2 Estimation IV.B.3 Data Quality Evaluation IV.B.4 Data Presentation	guidelines. The type of error shall be bias, response rate is the accuracy indicator. MS has to change it in the table IV.B.2. MS should consider different enterprise sizes. If this is the case, the method to derive final estimates is not scientifically adequate. MS should consider non response. MS is asked to provide information on methods to assess the variability of the estimates and bias and in general how to assess data quality. MS is asked to address confidentiality problems.	

VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.4 MEMBER STATE : DENMARK PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Mostly
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
 (a) MS has put a lot of effort in compiling the NP 2011-2013. The NP is clearly defining the data collection which is proposed to be carried out by Denmark for the period 2011-2013. (b) The regional structure is strictly followed in the report as required by the guidelines. The uniform structure of the NP of all MS facilitates the evaluation of the report by SGRN; however this is leading to unnecessary repetition of text. 	
 (c) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of economic fleet variables. MS is asked to clarify issues regarding the clustering scheme. (d) MS is asked to follow the DCF definition of target population which states that only vessels registered by the 1st of January of the reference year is included in the target population. 	

SECTION - MODULE	MAJOR SGRN COMMENT
	SGRN considers that MS has followed the guidelines
I General Framework	
II Organization of NP	SGRN considers that MS has partly followed the guidelines.
I Organization of NF	All international coordination should be listed, inclusive non- eligible;
	MS need to provide preliminary list in Table II.B.1
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	SGRN considers that MS has followed the guidelines
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	 Part information on methodology used is missing in the section. MS is asked to provide more detailed information. MS is asked to follow the DCF definition of target population which states that only vessels registered by the 1st of January of the reference year is included in the target population According to the commission decision clustering may take place in the case when a segment consists of less than 10 vessels. MS is asked to justify the clustering scheme used in Table III.B.2 when clustered segments are sufficiently large.
III.B.2 Estimation	MS is asked to provide further information on estimation techniques including formulas to derive final estimates.
III.B.3 Data Quality Evaluation	No Comment
III.B.4 Data Presentation	No Comment
III.B.5 Regional Co- ordination	No Comment
III.B.6 Derogations and Non Conformities	No Comment

III.C Biological – Metier Related Variables	Baltic Sea
III.C.1 Data Acquisition	SGRN feels that this section mostly follows the guidelines. Sampling frame codes in Table III_C_3 does not match with those on table III_C_4. SGRN recommend MS to follow guidelines in 2012 NP revision. For most of metiers MS states in the texts of NP: "The metier will be sampled concurrently in harbours/at markets by purchasing unsorted samples" while in table III_C_4 appear, "Other [Market stock specific sampling]"as sampling strategy. The sampling strategy to be clarified by MS. In table III_C_4 appears sampling scheme 3 in metiers with a sampling strategy different from "at sea sampling". Sampling scheme 3 implies sampling at sea the group 3 species; this should not be composed with a strategy different from at sea sampling. The sampling strategy to be clarified by MS. Regarding codification and naming convention there seems to be a mismatch between metier names in texts and tables. (e.g. PTB_SPF_32-89_0_0 in tables and PTB_SPF_>=32_0_0 in texts for derogations // LHP_FIF_0_0_0 in tables and LHP_FIN_ALL_0_0 in texts for derogations). SGRN recommends MS to follow the codifications and naming conventions settled in RCMs. It is not clear if small scale fisheries are included in frame. SGRN ask for MS to give any justification to merge métiers or scientific rationale behind the decision to merge the specific métiers.
III.C.2 Estimation Procedure	No description about methods that will be used for estimating the discards volumes and the length and age structure of the catches. MS mention only "a study". The reference of the study and more information to be provided by MS.
III.C.3 Data Quality evaluation	Only quality checks in national database are mentioned. No mention about indications of precision, procedures developed for validation and quality checks or about raising procedures. More information to be provided by MS

III.C.4 Data Presentation	
III.C.5 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	Denmark has requested derogations for sampling on board 8 metiers in Baltic Sea. It appears that the derogation is asked for sampling discards only and suggests that landings will be sampled in harbours. The justification is "proved low discarding". However, SGRN notes that at least some of the métiers have been merged with others for sampling and the derogation should be asked for the group métier which have been merged. Other of these métiers has not been picked up by ranking, so no derogation is needed for not to sample them. Only one métier (FPN_CAT_ALL_0_0) rest in a situation different from the above ones. According to DCF, all metiers selected by the ranking system should be sampled for landings and discard. SGRN recognize that it will take time for MSs to adjust to the new DCF.
III.C Biological – Metier Related Variables	North Sea & East Atlantic
Related Variables	North Sea & East Atlantic SGRN considers that MS has followed mostly the guidelines
•	
Related Variables	SGRN considers that MS has followed mostly the guidelines
Related Variables	SGRN considers that MS has followed mostly the guidelines 2008-2009 is used as reference years for selecting métiers. It is not clear if the MS included small scale fisheries in the
Related Variables	SGRN considers that MS has followed mostly the guidelines 2008-2009 is used as reference years for selecting métiers. It is not clear if the MS included small scale fisheries in the sampling frame. Need to be clarified by MS The sampling years need to be specified individually Table III.C.5: see remark NS09; Anguilla anguilla is not in the list In 2010 MS will start initiated the data catch sampling towards a more design based approach by defining sampling frames in the sea sampling programme as well as applying random sampling of primary sampling units. For this NP the MS states it is premature to describe sampling designs, including sampling frames. The sampling frames described in table IIIC.4 may be

III.C.3 Data Quality evaluation III.C.4 Data Presentation	As the samp sources of b SGRN asks SGRN consi	ders that MS has followe ling frames may be revis ias could be redefined a MS to provide the updat ders that MS has followe	sed during the NP period, s well. ed information ed the guidelines	
III.C.5 Regional Co- ordination				-
III.C.6 Derogation and Non Conformities	There are 27 number of m Region	7 derogations asked for s nétier. Metiérs Level 6	sampling discards in a	
	Baltic Baltic Baltic	FPN_CAT_ALL_0_0 LHP_FIN_ALL_0_0 LHP_FIN_ALL_0_0	Verified by pilot studies to have <10% discard	
	North Sea North Sea North Sea North Sea North Sea North Sea North Sea	LLD_ANA_ALL_0_0 PTB_SPF_16-31_0_0 PTB_SPF_16-31_0_0 PTM_SPF_16-31_0_0 OTB_DEF_16-31_0_0 OTB_DEF_16-31_0_0 OTB_SPF_16-31_0_0 PTB_DEF_16-31_0_0 PTM_SPF_16-31_0_0 OTB_DEF_<=15_0_0 OTB_DEF_16-31_0_0 PTB_SPF_16-31_0_0	Fishery for industrial purposes. No discard.	
	Baltic North Sea North Sea North Sea North Sea North Sea North Sea North Sea North Sea	PTB_SPF_>=32_0_0 OTM_SPF_32-69_0_0 PS_SPF_ALL_0_0 PTM_SPF_32-69_0_0 OTB_SPF_32-69_0_0 OTM_SPF_32-69_0_0 PS_SPF_ALL_0_0 PTM_SPF_32-69_0_0 PTM_SPF_32-69_0_0	Consume fishery for herring. In general no significant discard but probably significant discard occasionally. The métiers has previously been monitored for discard by observer programs without verifying significant discard. It is believed that the reason is a combination of the infrequency of the massive discard incidents and to some extent the possibility for the vessels to change behaviour when having observers.	

	SGRN accepts the justification under condition that MS provide the references of the pilot studies and of the relevant documentation
III.C Biological – Metier Related Variables	North Atlantic
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines No discard occurs in the Danish fisheries carried out for this region. The fisheries carried out are historically the blue whiting fishery and a limited fishery for horse mackerel. In 2009 no blue whiting fishery took place. Therefore, Denmark request for derogation for discard sampling for this region. SGRN consider these derogation justified
III.D Biological – Recreational Fisheries	Baltic Sea
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN feels that this section mostly follows the guidelines No information was presented by MS on any methodology (sampling coverage, precision,) to evaluate the quality in this section.

	MS report some problems with responses to questionnaires and with catches made by tourist by no mention possible source of bias. Information to be provided by MS.
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.D.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines
III.D Biological – Recreational Fisheries	North Sea & East Atlantic
III.D.1 Data Acquisition	See Baltic Sea
III.D.2 Estimation Procedures	See Baltic Sea
III.D.3 Data Quality Evaluation	See Baltic Sea
III.D.4 Data Presentation	See Baltic Sea
III.D.5 Regional Co- ordination	See Baltic Sea
III.D.6 Derogations and Non Conformities	See Baltic Sea
III.E Biological – Stock Related Variables	Baltic Sea
III.E.1 Data Aquisition	Target and frame population are still in process of definition." Denmark plan to use the outcome from the workshops (WKACCU, WKPRECISE and WKMERGE.) as a guidance to set the target and sampling frame".

	SGRN ask MS to provide this information for the revision of 2012 NP when they are expected to be already implemented.
	Regarding sampling stratification and allocation scheme, information about sources used for collecting stock-related variables (commercial fisheries, surveys) is available in tables. However, the NP text does not mention protocols or how data will be collected, on length stratification, triennial sampling etc. More information to be provided by MS.
III.E.2 Estimation Procedures	MS do not mention any method to estimate stock biological variables. MS says "estimation of the biological stock-related variables is carried out by international planning or expert groups". MS should refer on agreed international methodologies.
III.E.3 Data Quality Evaluation	MS does not provide any information on methodology to evaluate the quality and any source of bias. MS only sates that "measurements are being screened by data base checking procedures before they are stored in the national database". SGRN asks MS to provide full information how MS is going to achieve the planned precision levels, coverage etc.
III.E.4 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.E.5 Derogations and Non Conformities	Following the guidelines MS should, in this section, list the appropriate recommendations from all relevant RCMs and give a brief description of the responsive actions that will be taken. MS to provide this missing list.
III.E Biological – Stock Related Variables	North Sea & East Atlantic
III.E.1 Data Aquisition	SGRN considers that MS has mostly followed the guidelines In table III.E.1 there are no % share in EU landings given.
	The species referenced in the column "species " in table III.E.2 exactly match with the species not highlighted in Table III.E.1
	MS refers in Table III.E.3 to the sampling years as the period 2011-2013. MS should follow the guidelines and give the sampling intensity for stock-related variables by individual sampling year
	MS indicates a minimum level and precision as well
	It cannot be expected that the target and frame populations are matching when the MS has no full access to the whole distribution area of the stock. In most cases this is the normal situation. This should be a general comment

	MS gives a rather short description only stating the type of data collection. A comprehensive description is assumed to be presented in the métier related module, and MS should refer to this section. MS needs to provide an update of the tables III.E.1, III.E.3
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines Potential sources of bias are not mentioned. MS needs to provide information on sources of bias
III.3.4 Data presentation	SGRN considers that MS has followed the guidelines Missing information about data presentation. Due to a mistake, this heading does not appear in guidelines, so is acceptable not to be this information here. SGRN assumes that MS provide the biological data collected to assessment WG it attends.
III.E.5 Regional Co- ordination	SGRN considers that MS has partly followed the guidelines The MS refers to a list of relevant recommendations with each request accompanied by a comment on how Denmark has applied to the request. This list is missing. MS is asked to provide the list of relevant recommendations
III.E.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines As Denmark is not conducting any research vessel survey in areas and periods where data on fecundity for mackerel and horse mackerel can be collected, Denmark asks for derogation for collecting the data. SGRN consider these derogations justified
III.E Biological – Stock Related Variables	North Atlantic
III.E.1 Data Acquisition	No Comment
III.E.2 Estimation Procedures	No Comment
III.E.3 Data Quality Evaluation	No Comment

III.E.4 Regional Co- ordination	No Comment
III.E.5 Derogations and Non Conformities	The Danish landings of fish caught in the North Atlantic region are below the threshold of 10% of the EU quota and will therefore not be sampled for stock specific variables.
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No comments.
III.F.2 Effort	MS is asked to clarify if it collects all the variables listed in the commission decision. MS is asked to clarify if all effort indicators are collected for vessels <10m.
III.F.3 Landings	MS is asked to clarify the reference years.
III.G Research Surveys at Sea	Baltic Sea
III.G.1 Planned Surveys	SGRN considers that all surveys planned by MS are in the current list eligible surveys
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
III.G Research Surveys at Sea	North Sea
III.G.1 Planned Surveys	SGRN considers that all surveys planned by MS are in the

	current list eligible surveys
	, , ,
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co- ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	No Comment
IV.A.2 Data Aquisition	Table IV.A.3 shows A and C as data collection type. This should be reflected in table IV.A.2. MS is asked to clarify.
IV.A.3 Estimation	MS is asked for detailed description of the planned methodology for estimation of the final values of the variables.
IV.A.4 Data Quality	MS is asked to provide information on methods to assess the variability of the estimates and bias.
IV.A.5 Presentation	No Comment
IV.A.6 Regional Co- ordination	No Comment

IV.A.7 derogation and Non Conformities	No Comment
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has mostly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked to provide latest available figures in table IV.B.1.The type of error is bias, response rate is the accuracy indicator. MS has to change it in the table IV.B.2. MS is asked to provide more detailed information on FTE national. How is it calculated, by using with number? MS is asked to check if the type of data collection is really a census for all variables, even if some variables are imputed.
IV.B.2 Estimation	MS should consider non response. MS is asked for clarification for those variables that are imputed.
IV.B.3 Data Quality Evaluation	MS is asked to consider the method used for assessing the quality in case of sampling with imputation of the values.
IV.B.4 Data Presentation	No Comment
IV.B.5 Regional Co- ordination	No Comment
IV.B.6 Derogation and Non Conformities	For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. To be addressed by MS.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines mostly. The table V.1 is not completed comprehensively. From the descriptive part in the Module V of the NP program it is clear that the requested data is collected. The columns effective time lag for availability and time interval for position reports are not requested in planning, but is relevant for TR. SGRN asks MS to complete table V.1 according the guidelines
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines Data bases are very well described but it is not clear how the quality control and validation process of the primary and aggregated data are made. More information to be provided by MS.

VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has partly followed the guidelines . The list presented by MS is incomplete as it contains only the métier related derogations and not the stock related derogations. The overview is not presented in the format of the guidelines. The list of historical derogations with the reference with the NP year is missing. SGRN asks MS to provide the missing information
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

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1.5 MEMBER STATE : ESTONIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Partly
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Partly
9 Did the NP allow SGRN to evaluate what is planned by the	Partly
MS ?	
10 Overall Comments by SGRN on NP	
(a) SGRN recognizes the MS for its effort in compiling the NP in	
good accordance with the Guidelines. The specific comments	
and observations of SGRN are given below.	
and observations of SOMM are given below.	
(b) See the General comment B2.	
(c) Potential sources of bias and means to mitigate them should	
be described data quality evaluation -sections of the NP	
(d) See the General comment B4	
(e) Overall SGRN feels that the MS has partly complied with	
the guidelines regarding the description of the collection of	
economic fleet variables. Clarification on methodologies for the	
collection of variables not defined the commission decision is	
needed. Further information on estimation procedures and data	
quality evaluation is needed.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that this section has followed the guidelines.
II Organisation of NP	SGRN considers that this section has followed the guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines.
III.B.1 Data Acquisition	MS is asked to provide more detailed information on the method used to estimate capital value, fuel efficiency of fish capture and Imputed value of unpaid labour.
	MS could clarify why random sampling cannot be put in place.
	MS reports fairly high planned sample rates but could clarify on which basis this sample coverage is calculated on.
III.B.2 Estimation	MS should provide information on estimation procedure and on the methods used to estimate variables in the case of census and non-response.
III.B.3 Data Quality Evaluation	MS has to provide more detailed and clear information on how they calculated accuracy indicator (bias and variability) measures.
III.B.4 Data Presentation	No special comments.
III.B.5 Regional Co-ordination	MS is asked to check the list of RCM recommendations and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities	No special comments.
III.C Biological – Metier Related Variables	SGRN considers that this section has followed the guidelines mostly.
III.C.1 Data Acquisition	SGRN considers that this section has mostly followed the guidelines See general comment 3. MS should follow the guidelines in this respect as well.

	The type of data collection (census/probability/non- probability) and the target and frame populations were not described in NP. The description of the type of data collection should be included in this section. Additionally, the missing description of the target and frame populations should be included.
III.C.2 Estimation Procedure	SGRN considers that this section has followed the guidelines
III.C.3 Data Quality evaluation	Potential sources of bias are not described in NP.
III.C.4 Data Presentation	MS should describe potential sources of bias and how to mitigate them.
III.C.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
III.D Biological – Recreational Fisheries	SGRN considers that this section has followed the guidelines mostly.
III.D.1 Data Acquisition	SGRN considers that this section mostly has followed the guidelines At present, catch reports are obtained from licensed fishermen only. SGRN notes that MS plans a larger questionnaire to be carried out in 2011-2013 (with pilot study in 2010). This study should cover the whole population. As this larger questionnaire is still under development, many of the details are not clear in the NP. The MS should update its NP when the plans are completed.
III.D.2 Estimation Procedures	The MS should update its NP when the plans are completed.
III.D.3 Data Quality Evaluation	The MS should update its NP when the plans are completed. MS should describe potential sources of bias and how to mitigate them, missing in the NP.
III.D.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.D.6 Derogations and Non Conformities	SGRN considers that this section has followed the guidelines
III.E Biological – Stock Related Variables	SGRN considers that this section has followed the guidelines mostly.

III.E.1 Data Acquisition	SGRN considers that this section has followed the guidelines
III.E.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that this section has followed the guidelines partly
	The methods for data quality evaluation were not described. MS should describe how data quality is evaluated. MS should describe potential sources of bias and how to mitigate them.
III.E.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.E.5 Derogations and Non Conformities	See general comment 2.
III.F Transversal Variables	SGRN feels that the MS has partly complied with the guidelines.
III.F.1 Capacity	No special comments.
III.F.2 Effort	MS is asked to provide information on data collection within the EFIS framework.
	MS is asked to provide information on how to handle "non- response".
	MS is required to clearly identify the reference years.
	MS is required to ask for derogations in the case when it does not intend to collect all the specified variables in the commission decisions.
III.F.3 Landings	MS is asked to provide information on data collection within the EFIS framework.
	MS is asked to provide information on how to handle "non- response".
	MS is required to clearly identify the reference years.
	MS is required to ask for derogations in the case when it does not intend to collect all the specified variables in the commission decisions.
III.G Research Surveys at Sea	SGRN considers that this section has followed the guidelines.
III.G.1 Planned Surveys	SGRN confirms that all surveys are in the current list of eligible surveys
III.G.2 Modification in the Surveys	No modifications
III.G.3 Data Presentation	SGRN considers that this section has followed the

	guidelines
III.G.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has partly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	MS states that it will provide information in the future on the sector which are already needed here. To be addressed by MS.
IV.A.2 Data Acquisition	MS is asked to clarify why the text of the NP does not refer to salmon and eel as shown in table IV.A.1. Additionally non sampling of other species than trout has to be indicated in this table according to the guidelines. Sampling for salmon and eel is mandatory and non sampling has to be justified. Reference year is different for both segments. Also all years of the NP should be addressed. Table IV.A.2 to be adjusted. MS is asked for further description how the consistency of data coming from different sources will be ensured. MS is asked to provide detailed definition e.g. for imputed labor and financial costs, net. The information is partly given in another section of the NP. So MS is recommended to follow the structure according the guidelines.
IV.A.3 Estimation	MS is asked for detailed description of the planned methodology for estimation of the final values of the variables.
IV.A.4 Data Quality	MS should describe how the problem of expected high non- response rate will be addressed methodologically.
IV.A.5 Presentation	No Comments
IV.A.6 Regional Co-ordination	No Comments
IV.A.7 derogation and Non Conformities	No Comments
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has partly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked to list all reference years in the tables. Type of error is bias. Accuracy indicator is coverage rate. MS is

	asked to change the table according this. MS is recommended to follow the structure according the guidelines.
	MS is asked for further description how the consistency of data coming from different sources will be ensured. MS to clarify selection of sample units.
	MS states the target of a coverage rate of 60%. No further explanation or justification is provided. MS to clarify the
	reason for choosing this target.
IV.B.2 Estimation	MS is asked for detailed description of the planned methodology for estimation of the final values of the variables.
IV.B.3 Data Quality Evaluation	MS is asked to provide information on methods to assess the variability of the estimates and bias and in general how to assess data quality.
IV.B.4 Data Presentation	No Comments
IV.B.5 Regional Co-ordination	No Comments
IV.B.6 Derogation and Non Conformities	For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. MS to address this in its NP.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that this section has followed the guidelines mostly. NP plans to use gill-net test fishing data for calculation of ecosystem indicators 1-4. This approach can be accepted by SGRN. A more detailed description of test-fishing and data expected to be obtained should be presented in this section of NP.
VI Module for the Management and Use of Data	SGRN considers that this section has followed the guidelines.
VII Follow up of STECF Recommendations	SGRN considers that this section has followed the guidelines.
VIII List of Derogations	SGRN considers that this section has followed the guidelines.
IX List of Acronyms and Abbreviations	SGRN considers that this section has followed the guidelines.
X Comments, Suggestions and Reflections	N/A

XI References	SGRN considers that this section has followed the guidelines.
XII Annexes	SGRN considers that this section has followed the guidelines.

1.6 MEMBER STATE : FINLAND PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) SGRN recognizes the MS for its effort in compiling the NP in good accordance with the Guidelines. The specific comments and observations of SGRN are given below.	
(b) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of economic fleet variables. Clarification on which methodologies are used to estimate the variables which are not clearly defined in the DCF is needed. Information on how to check the consistency of data derived from different data sources is needed.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the Guidelines
II Organisation of NP	SGRN considers that MS has followed the Guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	MS is recommended to separate each reference year in the standard Tables in order to be able to update it annually. Asterisks should be in the column of fleet segments. The number in the column planned sample rate should be reversed to be consistent with the other columns. MS is recommended to name the supra regions in accordance with the DCF. MS is asked to clarify what methodology is used to estimate the variables which are not clearly defined in the DCF. MS is asked to clarify how the consistency of information coming from different data sources is checked.
III.B.2 Estimation	Some information about estimation of final indicators is presented in the text, how ether MS is asked to provide further information on estimation techniques including formulas to derive final estimates.
III.B.3 Data Quality Evaluation	MS is asked to provide further information in the text on estimation of variability and accuracy of the data collected.
III.B.4 Data Presentation	No comments
III.B.5 Regional Co-ordination	No comments
III.B.6 Derogations and Non Conformities	No comments
III.C Biological – Metier Related Variables	SGRN considers that MS has followed the Guidelines
III.C.1 Data Acquisition	SGRN considers that this section has followed the guidelines

III.C.2 Estimation Procedure	SGRN considers that this section has followed the guidelines
III.C.3 Data Quality evaluation III.C.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
	MS has demanded the prolongation of derogations for discard sampling of herring, sprat, cod, salmon and trout, in force since 2003. Given that MS has provided the information on appropriate pilot studies SGRN agrees with the derogation.
III.D Biological – Recreational Fisheries	SGRN considers that MS has followed the Guidelines
III.D.1 Data Acquisition	SGRN considers that this section has followed the guidelines
III.D.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that this section has followed the guidelines
III.D.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.D.6 Derogations and Non Conformities	MS is suggesting sampling recreational fishery biannually. MS, referring on the results of the pilot study on cod and salmon fishery suggesting " a cost-efficient data collection strategy, with respect to the reliability, is to collect data on recreational fishing every second year suggests performing sampling of recreational fishery every second year". However, the results of the pilot study are not comprehensively presented in the NP. Also, there is no reference to the pilot study mentioned. According to the NP Guidelines " if another updating periodicity than annual (according to the DCF regulation) is adopted, the reasons for this should be fully documented and explained". SGRN finds this proposal not justified.
III.E Biological – Stock Related Variables	SGRN considers that MS has followed the Guidelines

III.E.1 Data Acquisition	SGRN considers that this section has followed the guidelines
III.E.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that this section has followed the guidelines
III.E.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.E.5 Derogations and Non Conformities	SGRN considers that this section has followed the guidelines
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	MS is asked to clarify the reference year and provide information when monthly data will be available.
III.F.3 Landings	MS is asked to clarify the reference year and provide information when monthly data will be available.
III.G Research Surveys at Sea	SGRN considers that MS has followed the Guidelines mostly
III.G.1 Planned Surveys	SGRN considers that this section has followed the guidelines partly
	There is presented only one map for BIAS survey. Not maps for BITS surveys. MS to update the NP
III.G.2 Modification in the Surveys	SGRN considers that this section has followed the guidelines
III.G.3 Data Presentation	SGRN considers that this section has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines

IV.A.1 General Description of the Aquaculture Sector	MS is asked to explain the way to value the juvenile fish released to natural waters
IV.A.2 Data Aquisition	MS is asked to agree on following the definitions of the variables in the regulation and to specify definition on FTE.
IV.A.3 Estimation	No comments
IV.A.4 Data Quality	No comments
IV.A.5 Presentation	No comments
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines
IV.B.1 Data Acquisition	MS is asked to agree on following the definitions of the variables in the regulation and to specify definition on FTE. MS has to clarify the description of selection of sampling units
IV.B.2 Estimation	No comments
IV.B.3 Data Quality Evaluation	MS is asked to give detailed information on methods to assess the variability of the estimates and bias
IV.B.4 Data Presentation	No comments
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformioties	Not applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the Guidelines
VI Module for the Management and Use of	SGRN considers that this section has followed the guidelines mostly

Data	Method of validation and completeness of the primary and aggregated data, should be described in more detailed way by the MS.SGRN Also see General comment B3
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the Guidelines
VIII List of Derogations	SGRN considers that MS has followed the Guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the Guidelines
X Comments, Suggestions and Reflections	N/A
XI References	SGRN considers that MS has followed the Guidelines
XII Annexes	SGRN considers that MS has followed the Guidelines

1.7 MEMBER STATE : FRANCE PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Mostly
Programme ?	ŗ
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	No
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.7 Did MS take into account the recommendations made by	Moethy
RCM's	Mostly
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	Woody
10 Overall Comments by SGRN on NP	
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(a) The structure of the report is very well laid out, especially the	
index. SGRN appreciates that MS provided the NP proposal in	
English.	
(b) The non-allocation of sampling trips at sea is to be	
addressed as soon as possible by MS.	
(c) SGRN could not evaluate properly the metier-related	
variables in the Mediterranean section, because of major issues	
(including non sampling of GSA08) and incompleteness of tables.	
(d) Overall SGRN feels that the MS has mostly complied	
with the guidelines regarding the description of the	
collection of economic fleet variables. Further information	
on variables and estimation procedures is needed.	

SECTION - MODULE	MAJOR SGRN COMMENT
	Ok
I General Framework	
II Organisation of NP	No mention is made on who is responsible for the aquaculture sector. To be completed by MS
	Given the complexity of the MS NP, it was clear when doing the evaluation. The structure of the report is very well laid out, especially the index.
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	Ok
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines.
III.B.1 Data Acquisition	MS is asked to provide information also for the years 2011 and 2012, check consistency between different tables and provide information on the methods used to cluster segments. MS is required to provide the Annexes to which it refers in the text without including in the NP.
	MS is asked to provide more detailed information on the method used to calculate capital value and fuel efficiency of fish capture.
III.B.2 Estimation	MS claims that detailed information is provided in Annex IV which, nonetheless, is not available for evaluation. MS is required to provide information on the estimation techniques used.
III.B.3 Data Quality Evaluation	MS claims that detailed information is provided in Annex II which, nonetheless, is not available for evaluation. MS is required to provide information on the methods used to evaluate data quality.
III.B.4 Data Presentation	No special comments.
III.B.5 Regional Co-ordination	MS is asked to check the list of RCM recommendations and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities REGION NORTH ATLANTIC	MS is asking for a derogation in that it claims that this variable cannot be calculated at the required level. MS is required to justify in technical terms why they cannot satisfy this DCF requirement.

REGION NORTH ATLANTIC

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	Region North Atlantic

SECTION - MODULE	MAJOR SGRN COMMENT
III.C.1 Data Acquisition	SGRN considers that MS has partly followed the guidelines. France has chosen a different strategy to allocate at-sea sampling than the one specified in the guidelines. This strategy was to await the recommendations from the different RCMs to do the allocations, and presented only the total number of days at sea available for sampling by region (so that financial report could be completed). The plan to present the completed allocation of sampling trips before the SGRN evaluation failed due to time constraints. RCMs and LM commented that this approach would be too taxing for their meetings to evaluate, but endorsed the idea as a positive step toward better coordination. SGRN strongly recommends that France
	 carries out the analysis of sampling allocation, taking into account RCMs and LM recommendations
	Complete all the tables and text accordingly
	 Resubmit the completed and revised NP proposal as soon as possible (end of September).
	SGRN considers this approach is not in line with the current DCF and may result in a number of metiers not sampled. SGRN recognises the new strategy by France and considers this approach may point the way forward. This approach should be considered as a strategic issue for SGRN in the future, not to be taken as an example for the moment. No specific mention on how vessels under 10 meters are included in the sampling programme. To be clarified by MS. No justification on the rationale used for the merging of metiers.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.
III.C.5 Regional Co-ordination	SGRN considers that MS has mostly followed the guidelines. SGRN acknowledges that MS is an active participant to RCM NA, but encourages MS to strictly follow the recommendations.
III.C.6 Derogation and Non Conformities	 Derogations are demanded for sampling longlines fisheries (LLS_DEF_0_0_0) in Western Scotland and Western Ireland. SGRN notes from the RCM NA report that there is scope for such an arrangement. Until it is in place, SGRN recommends MS to sample this metier.

SECTION - MODULE	MAJOR SGRN COMMENT
	 sampling pots for whelks and pots for cuttlefish (FPO_MOL_0_0_0) in the Western Channel and sampling dredge for scallops (DRB_MOL_0_0_0) in the Bay of Biscay. See general comment on metier targeting G3 species.
III.D Biological – Recreational Fisheries	Region North Atlantic
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines.
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines.
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines.
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines.
III.D.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines.
III.E Biological – Stock Related Variables	Region North Atlantic
	Region North Atlantic SGRN considers that MS has mostly followed the guidelines. No mention on precision obectives is given in the text. SGRN recommends MS to provide the precision achieved in the TR 2010 for consideration in the revision of the NP proposal 2012.
Variables	SGRN considers that MS has mostly followed the guidelines. No mention on precision obectives is given in the text. SGRN recommends MS to provide the precision achieved in the TR 2010 for consideration in the revision of the NP
Variables	SGRN considers that MS has mostly followed the guidelines. No mention on precision obectives is given in the text. SGRN recommends MS to provide the precision achieved in the TR 2010 for consideration in the revision of the NP proposal 2012.
Variables III.E.1 Data Acquisition III.E.2 Estimation Procedures	SGRN considers that MS has mostly followed the guidelines. No mention on precision obectives is given in the text. SGRN recommends MS to provide the precision achieved in the TR 2010 for consideration in the revision of the NP proposal 2012. SGRN considers that MS has followed the guidelines

Region NORTH SEA & EASTERN ARCTIC

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	NORTH SEA & EASTERN ARCTIC
III.C.1 Data Acquisition	SGRN considers that MS has partly followed the guidelines.
	See comment on data acquisition in the North Atlantic.
	SGRN recommends that MS investigates the metier OTB_CAT_16-31_0_0, and update the tables III.C
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	 Derogation is demanded for sampling metiers operating in area I&II. This derogation was already supported by SGRN (2009). sampling pots for crustaceans (FPO_CRU_0_0_0) because landings are very small and spread over lots of landings sites. SGRN considers that there is no much scope for regional agreement, and MS should sample this metier.
III.E Biological – Stock Related Variables	NORTH SEA & EASTERN ARCTIC
III.E.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	No mention on precision objectives is given in the text. SGRN recommends MS to provide the precision achieved in the TR 2010 for consideration in the revision of the NP proposal 2012.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines No potential bias is discussed in the text. To be clarified by MS.
III.E.4 Regional Co-ordination	SGRN considers that MS has partly followed the RCM recommendations. SGRN encourages MS to strictly follow the
	recommendations.

SECTION - MODULE	MAJOR SGRN COMMENT
III.E.5 Derogations and Non Conformities	 Derogations is demanded for sampling a) haddock and cod in area I&II. This derogation was already supported by SGRN (2009). b) saithe in area I& II, as the catches are done on the southern part of the area, and should be considered as an extension of the IV, IIIa and VI stock. SGRN supports RCM NS&EA recommendation that extension of catches in neighbouring areas should be considered as part of the main fishing ground (here the North Sea).

Region MEDITERRANEAN & BLACK SEA

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	MEDITERRANEAN & BLACK SEA
III C 1. Data Acquisition	SGRN considers that MS has partly followed the guidelines.
III.C.1 Data Acquisition	Data on landings and value are missing. Ranking system is thereby incomplete which may affect the entire sampling programme. MS need to update table.
	SGRN appreciates that GSA 08 are included in the French sampling programme (Table III.C.1). It appears that some of the picked metiers will not be sampled by France. This is particularly true for all metiers in GSA 08 (Corsica). SGRN does not consider this acceptable. Reasons for not sampling metiers selected should be given.
	It is unclear for which metiers sea sampling will be carried out. This is not acceptable. The text does not correspond to the table. The table III.C.3 is not complete and there are inconsistencies between III_C_3 and III_C_4.
	No sampling strategy for 2012 and 2013. MS should clarify were and to what extent sea sampling should occur.
	Several discrepancies in the coding of all tables. The agreed naming conventions are not followed (fishing grounds shoud be the different GSA following agreement in RCM med&BS). No national sample levels are reported and time stratification does not exist in Table III.C.5.
	All species in appendix VII should be reported. This is not the case since most species are missing. SGRN suggest France to resubmit the table.
	SGRN recommends MS to resubmit the tables and text.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has mostly followed the guidelines Bias is not mentioned. Information to be brought by MS.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines

SECTION - MODULE	MAJOR SGRN COMMENT
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	Non listed but non conformities raised by SGRN. See section above.
III.D Biological – Recreational Fisheries	MEDITERRANEAN & BLACK SEA
III.D.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines. Ok but for eel. See section on derogations.
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines Bias is not mentionned. Information to be brought by MS.
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.D.6 Derogations and Non Conformities	France is asking for derogation for eels (in marine waters) and salmon 2011 onwards .SGRN considers the justification for the derogations acceptable. MS should clarify the text regarding sampling recreational fisheries on eel in inland waters. SGRN do not consider a derogation acceptable because it seems from the text that there is a fishery for eel. To be clarified by MS.
III.E Biological – Stock Related Variables	MEDITERRANEAN & BLACK SEA
III.E.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	France need to fill in the species groups in table III.E.1. All species, including sharks, listed in appendix VII should be included in the table. MS say they will not sample Thunnus thynnus, this is not in accordance with the RCM MED&BS recommendation. According to the RCM the landings are 134 tonnes and they should sample 17 specimens. In table III_E_2 MS say that they will sample in 2013.
	Area/stock should be provided level 4 appendix 2 of the Comm. Dec. 93/2010 (GSA)
	MS to clarify and update tables

SECTION - MODULE	MAJOR SGRN COMMENT
	Frame population not described in the report.
III.E.2 Estimation Procedures	SGRN considers that MS has mostly followed the guidelines
	MS needs to elaborate on estimation procedures.
III.E.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines
	MS is asked to clarify methods to be used for calculating precision and validation of quality check methods.
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.E.5 Derogations and Non Conformities	None

Other Region WECAF

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	Other Region (WECAF)
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	SGRN recommends MS to include an estimate of discards of the shrimp fisheries, at least once during the 3 year period of the programme.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.
III.C.5 Regional Co-ordination	NA
III.C.6 Derogation and Non Conformities	No derogation demanded
III.E Biological – Stock Related Variables	Other Region (WECAF)
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.
III.E.4 Regional Co-ordination	NA
III.E.5 Derogations and Non Conformities	No derogation demanded

Other Regions ICCAT

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	OTHER REGIONS (ICCAT)
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	Ms should use table IIIC2 to disaggregate the metier LLD_LPF_0_0_0 to split it in the 3 fishing ground indicated in the table IIIC3 so that all the IIIC tables are consistent.
	MS to clarify why in the fishing ground section the BIL codes are used while in previous tables the fishing ground is described as ICCAT North Atlantic etc. Ms to update tables so that there are no inconsistencies in the fishing ground and tables are comparable.
	MS is required to improve the metier description for large pelagic fish targetting Xiphias gladius including by catch species.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	None
III.E Biological – Stock Related Variables	OTHER REGIONS (ICCAT)
III.E.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
	Thunnus thynnus is selected for sampling in table IIIE1 but not in table IIIE2. MS to clarify
	MS to fill in minimum number of fish to sample. MS to clarify why for some stock related variables data sources are listed as N/A or empty. MS is requested to update the table following the guidelines.
	SGRN notes that independently from the RFMO, DCF requires the collection of stock related variables and MS should follow EC 93/2010.
III.E.2 Estimation Procedures	SGRN considers that MS has mostly followed the guidelines MS has to elaborate on the protocol and precision objectives for all the species.
III.E.3 Data Quality Evaluation	SGRN considers that MS has mostly followed the guidelines MS has to elaborate on the methods for all the species. MS to clarify when the data will be available.
III.E.4 Regional Co-ordination	NA
III.E.5 Derogations and Non Conformities	Derogations are not clearly explained and hence SGRN cannot accept such derogations. SGRN recommend MS to collect the requested data for all the species according to Comm. Dec. 2010/93/EU.

ALL REGIONS

SECTION - MODULE	MAJOR SGRN COMMENT
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines.
III.F.1 Capacity	No special comments.
III.F.2 Effort	MS is required to clarify on the strategy implemented in her sampling plan especially for vessels under 10m of length operating in the Mediterranean and the North Sea areas. At this stage it is not possible to evaluate the request of derogation because no info has been provided by MS. MS claims that this information will be available in a pilot study that will be presented along with French Technical Report at the end of 2009.
III.F.3 Landings	MS is asked to provide more detailed information on the sampling survey to apply in the Mediterranean for vessels under 10m. MS claims that data for vessels under 10m could not be available. Nonetheless, MS is asked to comply with the DCF regulation.

SECTION - MODULE	MAJOR SGRN COMMENT
III.G Research Surveys at Sea	ALL REGIONS
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines.
	In the Mediterranean, areas should be reported by GSA as agreed by the RCM Med&BS and following 93/2010. Medias (and not Medias PELMED) should be named in accordance with 93/2010. In the Mediterranean, No regional database but common exchange format. For Medits RDB in progress.
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	None
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	ALL REGIONS
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	MS is asked to explain the NS markings in the table IV A.1, where some of these are in cells where delivering of data is compulsory.
IV.A.2 Data Acquisition	Most variables will be defined by a national group in a special paper. MS are asked for this paper. MS are asked to explain the inconsistency between the population and the NS marks in table IV A 1.
IV.A.3 Estimation	No comments
IV.A.4 Data Quality	No comments
IV.A.5 Presentation	MS asked to consider any confidentiality problems.
IV.A.6 Regional Co-ordination	Not applicable

SECTION - MODULE	MAJOR SGRN COMMENT
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines.
IV.B.1 Data Acquisition	MS are asked for detailed method for imputed unpaid labour and extraordinaire costs. MS are asked for explanation of "snails off" and for reason of threshold of 5.0 mill. Euro for champ 0 enterprises.
IV.B.2 Estimation	No comments
IV.B.3 Data Quality Evaluation	No comments
IV.B.4 Data Presentation	MS asked to consider any confidentiality problems.
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformities	Not applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has mostly followed the guidelines. VMS is collected presently at level 5 but steps are being made to collect to level 6. A derogation is demanded for the calculation of the fuel consumption estimates by metier and sub-regions in the future programmes.
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines.
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines.
VIII List of Derogations	SGRN considers that MS has followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	Issues raised to be addressed by DG-MARE
XI References	Ok
XII Annexes	Ok

1.8 MEMBER STATE : GERMANY PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	Vee
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of the data for scientific analyses purposes?	Yes
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over	Yes
Waters in the same marine regions. 7 Did MS take into account the recommendations made by RCM's	Yes
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
(a) The NP is clearly describing the data collection which is proposed to be carried out by the GER. Sufficient clarification and justification is given on the proposed sampling strategies and methods used for evaluating the quality of data.	
(b) Overall SGRN feels that the MS has done a good job and mostly complied with the guidelines regarding the description of the collection of economic fleet variables, but further information to correct for potential bias is needed as well as information on inactive vessels.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the guidelines
II Organisation of NP	SGRN considers that MS has followed the guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	SGRN considers that MS has followed the guidelines
III.B Economic Variables	SGRN feels that MS has mostly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to provide more information and justification on the clustering of high sea vessels with smaller vessels. MS is asked to follow the commission decision which defines the activity of a vessel by effort and not by landings. MS is asked to provide information on inactive vessels
III.B.2 Estimation	No comments
III.B.3 Data Quality Evaluation	MS is asked to provide further information on correction procedures for potential bias
III.B.4 Data Presentation	No comments
III.B.5 Regional Co-ordination	No comments
III.B.6 Derogations and Non Conformities	Not applicable
III.C Biological – Metier Related Variables	Baltic Sea
III.C.1 Data Acquisition	SGRN considers that MS has folowed the guidelines mostly There seems there is a mismatch between table III_C_1 and III_C_2 . 4 metiers picked up by ranking in 27.III SD 22- 24 (GNS_SPF_32-109_0_0, OTB_DEF_>=90_0_0, PTB_DEF_>=90_0_0, PTB_SPF_16-31_0_0), in table III_C_1 do not appear in table III_C_2 but two of them (PTB_DEF_>=90_0_0, PTB_SPF_16-31_0_0) appears again in table III_C_3

SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
North Sea & East Atlantic
SGRN considers that MS has followed the guidelines. Table should be updated in relation to bilateral agreements,
SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
North Atlantic
North Atlantic SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines
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III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
III.C Biological – Metier Related Variables	Other Regions
III.C.1 Data Acquisition	
III.C.2 Estimation Procedure	
III.C.3 Data Quality evaluation III.C.4 Data Presentation	
III.C.5 Regional Co-ordination	
III.C.6 Derogation and Non Conformities	A derogation is asked for sampling in the CECAF area. SGRN recognises, that MS concerned have agreed in the RCM LD to develop a regional sampling plan together before the next RCM. SGRN recognises that RCM-LD has just be established, supports the initiative of the regional approach, and realises that it will take some time to develop such a programme. SGRN considers that a derogation can be accepted for 2011 but not for the following years. If a recommended derogation for 2011 is accepted, MS should resubmit the NP for 2012.
III.D Biological – Recreational Fisheries	Baltic Sea
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines mostly. Target and frame populations are not mentioned
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	There is no regional coordination (but this is the same for all other nations)
III.D.6 Derogations and Non Conformities	Sharks are not mentioned and no derogation is asked The derogation for Salmon is already granted and is fully documented

III.D Biological – Recreational Fisheries	North Sea & East Atlantic	
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines	
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines	
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines	
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines	
III.D.5 Regional Co-ordination	There is no regional coordination (but this is the same for all other nations)	
III.D.6 Derogations and Non Conformities	Germany proposes sampling plans for the recreational fishery on cod, eel and sharks. For the latter two species a pilot study is proposed. In the previous programme a derogation for sampling North Sea recreational fisheries was granted	
III.E Biological – Stock Related Variables	Baltic Sea	
III.E.1 Data Acquisition	 SGRN considers that MS has followed the guidelines mostly Although Guidelines 2009 stated that: "The target population is the population for which inferences are made, and is clearly defined from the Appendix VII of Commission Decision 2008/949/EC to be the stocks within their geographical boundaries.", there is no mention to this in NP. SGRN ask MS to be check this in 2012 NP revision. The sampling protocols are only mentioned but no further description appear in is this section. There is no mention of how data will be collected, length stratification, triennial sampling. More information to be provided by MS. 	
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines	
III.E.3 Data Quality Evaluation	 A reference how the quality of the data is estimated is missing. Also the potential sources of bias should be mentioned 	
III.E.4 Regional Co-ordination	The missing list of RCM recommendations to be provided by MS	
III.E.5 Derogations and Non Conformities	There are no derogations requested	
III.E Biological – Stock Related	North Sea & East Atlantic	

Variables	
III.E.1 Data Acquisition	 Germany has reported the average landings by region in table III.E.1. Most other countries have reported the landings by stock. see general comment NS10
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	 Germany is aiming reaching a regional precision level expecting that the RCM NS will take an initiative. see general comment ???
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.E.5 Derogations and Non Conformities	There is one derogation, in which SGRN agrees. Furthermore, there are several non-conformities which are related to sampling more than required. SGRN agrees in that too.
III.E Biological – Stock Related Variables	North Atlantic
III.E.1 Data Acquisition	 Although Guidelines 2009 stated that: "The target population is the population for which inferences are made, and is clearly defined from the Appendix VII of Commission Decision 2008/949/EC to be the stocks within their geographical boundaries.", there is no mention to this in NP. SGRN ask MS to be check this in 2012 NP revision. The sampling protocols are only mentioned but no further description appear in is this section. There is no mention of how data will be collected, length stratification, triennial sampling. More information to be provided by MS.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	No information about method to estimate quality, (CV,) no reference to COST, no reference to ICES workshops (WKPRECISE, WKACCU,). The information to be provided by MS.
III.E.4 Regional Co-ordination	Any list of recommendation provided, only mention that "Germany follows the agreed procedures and recommendations". The missing list of RCM recommendations to be provided by MS
III.E.5 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines
III.E Biological – Stock Related Variables	Other Regions
III.E.1 Data Acquisition	No Comments

III.E.2 Estimation Procedures	No Comments
III.E.3 Data Quality Evaluation	No Comments
III.E.4 Regional Co-ordination	No Comments
III.E.5 Derogations and Non Conformities	see III.C.6
III.F Transversal Variables	SGRN feels that MS has mostly complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	MS is asked to supply sampling protocol and methods used for vessels <8m
III.F.3 Landings	No comments
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that MS has mostly complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	MS are asked for text on oyster production mentioned in Table IV A 1

IV.A.2 Data Acquisition	MS is asked to agree on following the definitions of the variables in the regulation. Definition of financial costs should be provided.	
IV.A.3 Estimation	MS is asked to take non response into consideration.	
IV.A.4 Data Quality	MS is asked to take non response into consideration.	
IV.A.5 Presentation	MS to clarify specifically each reference years. MS asked to consider any confidentiality problems	
IV.A.6 Regional Co-ordination	Not applicable	
IV.A.7 derogation and Non Conformities	Not applicable	
IV.B collection of data Concerning the Processing Industry	SGRN feels that MS has complied with the guidelines	
IV.B.1 Data Acquisition	MS is asked to agree on following the definitions of the variables in the regulation. MS is asked to clarify whether data for enterprises below 20 employees will be reported	
IV.B.2 Estimation	No comments	
IV.B.3 Data Quality Evaluation	No comments	
IV.B.4 Data Presentation	No comments	
IV.B.5 Regional Co-ordination	Not applicable	
IV.B.6 Derogation and Non Conformities	Not applicable	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines	
VI Module for the Management and Use of	The quality control is only mentioned briefly and no description is given of how the validation is done.	

Data	
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	There are none
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	Annex XII-1 Bilateral agreement with DEN Annex XII-2 Bilateral agreement with SWE Annex XII-3 Bilateral agreement with NL Annex XII3a Minutes of bilateral meeting with NL Annex XII-4 Bilateral agreement with UK Annex XII-5 Example of questionnaire for the economic data of the processing industry

1.9 MEMBER STATE : GREECE

No National Programme Received.

1.10 MEMBER STATE : IRELAND PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Mostly
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) NP proposal clear and comprehensive, that only needs some	
minor adjustments	
(b) The main issue to be addressed by MS is the clarification of	
the actual size of recreational fisheries and for inclusion and	
application for derogations.	
(c) Overall SGRN feels that the MS has mostly complied with	
the guidelines regarding the description of the collection of	
economic fleet variables. Further information on methodologies for variables not defined in the commission decision is needed.	
Tor variables not defined in the commission decision is needed.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	Ok
II Organisation of NP	Ok
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	Ok
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to clarify the method for calculating FTEs. MS has to provide a method for calculating imputed value of unpaid labour, MS is asked to provide further information on the method they use to ensure consistency of data coming from different data sources.
III.B.2 Estimation	No comments
III.B.3 Data Quality Evaluation	No comments
III.B.4 Data Presentation	No comments
III.B.5 Regional Co-ordination	Not applicable
III.B.6 Derogations and Non Conformities	Not applicable
III.C Biological – Metier Related Variables	Region North Atlantic
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines. Inconsistencies in tables to be sorted out (coding of OTB_SPF_32-69_0_0 should follow mesh size range, region not matching fishing grounds,). Rationale for merging of the pelagic metiers to be clarified. No mention of sampling under 10 meters vessels. To be

SECTION - MODULE	MAJOR SGRN COMMENT	
	clarified by MS.	
III.C.2 Estimation Procedure	SGRN considers that MS has mostly followed the guidelines.	
	Only discards on estimation procedure are described. See general comment.	
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.	
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.	
III.C.5 Regional Co-ordination	SGRN considers that MS has mostly followed the guidelines.	
III.C.6 Derogation and Non Conformities	 MS demands derogations for sampling DRB_MOL as the catches are not landed but used for aquacultire purpose. Acceptable. Non ranked metiers for discards, due to the low effort. SGRN notes that for the majority of these metiers, agreement has been reached in RCM NA on the marginal level of discarding of many of the listed metiers. SGRN notes also that the 3, 4 days of otter trawl in VIIIabd and beam trawl in VIIe do not require sampling. SGRN was informed that the trawling for deep water species no longer exist. SGRN supports the derogations demanded. 	
III.D Biological – Recreational Fisheries	Region North Atlantic	
III.D.1 Data Acquisition	SGRN considers that MS has partly followed the guidelines. Only salmon data collection is detailed.	
III.D.2 Estimation Procedures	SGRN considers that MS has partly followed the guidelines. Only salmon data collection is detailed.cies.	
III.D.3 Data Quality Evaluation	SGRN considers that MS has partly followed the guidelines. Only salmon data collection is detailed.	
III.D.4 Data Presentation	SGRN considers that MS has partly followed the guidelines. Only salmon data collection is detailed.	
III.D.5 Regional Co-ordination	SGRN considers that MS has partly followed the guidelines. Only salmon data collection is detailed.	
III.D.6 Derogations and Non Conformities	 MS does not demand for derogations, although they state not sampling for eel and sea bass, justified by the small size of the fishery. sharks, justified by the fact that catches are immediately released. SGRN sees this as non conformity with the DCF. See general comment. 	

SECTION - MODULE	MAJOR SGRN COMMENT	
III.E Biological – Stock Related Variables	Region North Atlantic	
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines.	
III.E.2 Estimation Procedures	SGRN considers that MS has mostly followed the guidelines. Only brief description given. See general comment.	
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.	
III.E.5 Regional Co-ordination	SGRN considers that MS has mostly followed the guidelines. No reference to RCM maturity table. To be clarified by MS.	
III.E.6 Derogations and Non Conformities	Derogations demanded by MS are for stocks falling within exemption rules.	
III.F Transversal Variables	SGRN feel that the MS has mostly complied with the guidelines	
III.F.1 Capacity	No comment	
III.F.2 Effort	MS is asked to reconsider the derogation since it is not justified and not in line with the guidelines	
III.F.3 Landings	MS is asked to reconsider the derogation since it is not justified and not in line with the guidelines	
III.G Research Surveys at Sea	ALL REGIONS	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines. MS to modify the naming of the blue whiting survey.	
III.G.2 Modification in the Surveys	NA	
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines.	
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines.	
III.G.5 Derogation and Non Conformities	None	

SECTION - MODULE	MAJOR SGRN COMMENT
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	ALL REGIONS
IV.A Collection of data Concerning Aquaculture	SGRN feel that the MS has mostly complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	No comments
IV.A.2 Data Acquisition	MS is asked to provide method for calculating the value of unpaid labour and the definition of financial costs used
IV.A.3 Estimation	MS is asked to explain how to deal with non response.
IV.A.4 Data Quality	No comments
IV.A.5 Presentation	No comments
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feel that the MS has mostly complied with the guidelines
IV.B.1 Data Acquisition	MS is asked to provide method for calculating the value of unpaid labour and the definition of financial costs used MS is asked to provide further information on the method they use to ensure consistency of data coming from different data sources.
IV.B.2 Estimation	No comments
IV.B.3 Data Quality Evaluation	MS is asked to give more detailed information on methodology.
IV.B.4 Data Presentation	No comments
IV.B.5 Regional Co-ordination	Not applicable

SECTION - MODULE	MAJOR SGRN COMMENT	
IV.B.6 Derogation and Non Conformioties	Not applicable	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines. MS to clarify when VMS data can be made available.	
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines.	
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines.	
VIII List of Derogations	SGRN considers that MS has followed the guidelines.	
IX List of Acronyms and Abbreviations	Ok	
X Comments, Suggestions and Reflections	Issues raised to be addressed by SGRN when reflecting on a revision of the Comm. Dec. 2010/93/EU.	
XI References	Ok	
XII Annexes	Ok	

1.11 MEMBER STATE : ITALY PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	,
10 Overall Comments by SGRN on NP	
(a) The Italian national proposal for the collection of fisheries is in general in accordance with EC 199/08 and Commission Decision 93/2010. SGRN appreciates the improvement that was done by member state.	
(b) Italy should provide a list of RCM recommendations and follow up actions.	
(c) Italy is asking for derogations to be exempted from sampling a number of species for biological related variables. MS is reminded that such derogations are unacceptable as they are against the exception rules in EC 93/2010 (e.g. catches below 200 tons).	
(d) Italy has within the NP provided a suggestion for an extension of the MEDIAS survey. SGRN consider this extension of the survey to be covered by the overall revision of surveys (SGRN 10-03). MS should put in their NP that this extension of the survey is subject to the approval STECF.	
(e) Overall SGRN feels that the MS has done a good job mostly complied with the guidelines regarding the description of the collection of economic fleet variables. Further justification on the clustering scheme is needed.	

SECTION - MODULE	MAJOR SGRN COMMENT	
I General Framework		
II Organisation of NP	SGRN considers that MS has followed the guidelines however	
	There is presently a tendering process for sub contractors. MS should provide a list of the involved partners in TR and/or in a revised NP.	
III Module on the Evaluation of the Fishing Sector		
III.A General Description of the Fishing Sector	Yes	
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines	
III.B.1 Data Acquisition	According to the commission decision clustering may take place in the case when a segment consists of less than 10 vessels. MS is asked to justify the clustering scheme in table III.B.2 when clustered segments are sufficiently large by them self.	
	MS is asked to present information in the relevant sections.	
III.B.2 Estimation	No comments	
III.B.3 Data Quality Evaluation	No comments	
III.B.4 Data Presentation	No comments	
III.B.5 Regional Co-ordination	No comments	
III.B.6 Derogations and Non Conformities	Not applicable	
III.C Biological – Metier Related Variables		
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines mostly. Minor revisions listed below are needed.	
	MS to clarify if the IvI 7 recommendation on large pelagic species has been followed in accordance with the ICCAT recommendation. MS to update table III_C_2	

III.C.2 Estimation Procedure III.C.3 Data Quality evaluation III.C.4 Data Presentation III.C.5 Regional Co-ordination	MS that do not participating in the regional sampling programme are included in column B in table III_C_3. This should be corrected. MS should provide reference descriptions also for metiers for which derogations are requested. MS should define the frame population. No Comments SGRN considers that MS has followed the guidelines. Mostly MS need to elaborate on sources of bias and update the text SGRN considers that MS has followed the guidelines. Mostly MS need to elaborate alist with relevant RCM recommendations and follow up actions
III.C.6 Derogation and Non Conformities	MS ask for derogation to sample 5 selected métiers; Driftnets for small pelagic species (GND_SPF_0_0_0) in the GSA 10 Driftnets for small pelagic species (GND_SPF_0_0_0) in the GSA 19 Fyke nets for demersal species (FYK_DES_0_0_0) in the GSA 17 Hand and pole line for cephalopods (LHP_LHM_CEP_0_0_0) in the GSA 19 Beach and boat seines for demersal species (SB_SV_DES_0_0_0) in the GSA 9 SGRN does presently not consider the reasons for not sampling the metiers justified even though the metiers are not picked by the regional ranking. MS invited to provide more detailed information (e.g analysis of cost effectiveness, pilot study) on the reasons for the derogation. MS ask for a derogation to sample certain metiers for discards. MS have previous performed pilot studies and showed that discards in these metiers are scarce. SGRN consider the justification acceptable.
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly MS to describe the frame population
III.D.2 Estimation Procedures	No Comments
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines Mostly MS need to elaborate on sources of bias and update text

III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines Mostly MS need to clarify when data is available to end user
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines No relevant RCM recommendations exist
III.D.6 Derogations and Non Conformities	No Comments
III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines MS need to update and resubmit the tables III_E_1, III_E_2 and III_E_3 if they do not get a derogation to sample <i>Trachurus trachurus</i> <i>Eledone moschata</i> <i>Boops boops</i> <i>Spicara smaris</i> <i>Eledone cirrhosa</i> <i>Loligo vulgaris</i> <i>Pagellus erythrinus</i> <i>Micromestius poutassou</i> <i>Lophius budegassa</i> <i>Trachurus mediterraneus</i> <i>Lophius piscatorius</i> <i>Eutrigla gurnardus</i> <i>Penaeus keraturus</i> <i>Trigla lucerna.</i> MS should describe the frame population.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines Mostly MS have to provide a list with relevant RCM recommendations and follow up actions
III.E.5 Derogations and Non Conformities	MS request derogations for a list (see below) of species for which the landings are over the exemption rules (93/2010). SGRN do not consider the justification for the derogation acceptable. <i>Trachurus trachurus</i> <i>Eledone moschata</i> <i>Boops boops</i> <i>Spicara smaris</i> <i>Eledone cirrhosa</i> <i>Loligo vulgaris</i> <i>Pagellus erythrinus</i> <i>Micromestius poutassou</i> <i>Lophius budegassa</i>

	 Trachurus mediterraneus Lophius piscatorius Eutrigla gurnardus Penaeus keraturus Trigla lucerna For Mugilidae MS was given a derogation in 2009. It is a complex of species and it is mostly caught in lagoons. SGRN finds the reason for not sample this species group for biological parameters acceptable and suggests the derogation to be prolonged. For species were the landings are smaller than 200 tonnes (Coryphaena equiselis, Dicentrarchus labrax and Sparus aurata) MS do not need to ask for a derogation.
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No Comments
III.F.2 Effort	MS is asked to supply sampling protocol and methods used for vessels <8m
III.F.3 Landings	No Comments
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines Naming conventions (MEDIAS) should be strictly followed. The NP suggest an extension of the MEDIAS survey affecting the maximum eligiable days. This is in line with recommendations of the steering Committee of the MEDIAS and the rcm Med&BS 2010. "The RCM support the proposal by the Medias Steering Committee to enlarge the area covered by the MEDIAS survey and recommends the Committee to present the proposal to the Comission as soon as possible". SGRN consider this extension of the survey to be covered by the overall revision of surveys (SGRN 10-03). MS should put in their NP that this extension of the survey is subject to the approval STECF.
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines Survey suggested to be extentended into the Thyrrenian Sea (GSA 9 and 10) with 30 extra days.
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines

III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	MS is asked to make consistency between species in table IVA 1 and general description i.e. description of eel production. Table text in description should be in English.
IV.A.2 Data Aquisition	MS is asked explain why final validation of 2010 data end in 2013 MS is asked for a more detailed description of sampling frame and allocation scheme
IV.A.3 Estimation	No comments
IV.A.4 Data Quality	No comments
IV.A.5 Presentation	MS is asked to consider confidentiality problems
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines
IV.B.1 Data Acquisition	MS is asked to explain the threshold of 10 employees MS is asked for more detailed definition of financial costs. MS is asked for clarification how the consistency of data coming from different data sources will be ensured. MS has to be aware of that enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing

IV.B.2 Estimation	No comments
IV.B.3 Data Quality Evaluation	MS is asked to give detailed information on methodology for assessing the variability of the estimates and bias and for assessing the acceptable quality of the data?
IV.B.4 Data Presentation	No comments
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformioties	Not applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	MS want clarification on the sampling needs for the sharks included in appendix VII in 93/2010. "Concerning the new Appendix VII of (EU Decision 93/2010), which includes a list of all sharks species, the European Commission should clarify which biological variables should be sampled and if precision level should be associated to the collection of both metier and stock related variables. The EU Decision 93/2010 is not enough clear on this issue. We report the recommendation of the RCMMed&BS 2009 " <i>RCMMed&BS was critical with the (too large) proposed list for the Mediterranean since some of the</i>

	proposed species are presumably not present in the supra- region. The group pointed out also about the necessity of clarify which biological variables should be sampled in each case of Appendix VII. RCM supports the idea to collect, as a first estimation, the metier based variables for these species (i.e. length structures of landings or of catches if sampling at sea). RCM supports the idea to collect, as a first estimation, the metier based variables for these species (i.e. length structures of landings or of catches if sampling at sea). Additionally, RCM noted that the sampling of sharks in the routine concurrent sampling schemes, poses a number of problems for certain metiers. The sampling of just a few shark individuals in these metiers, forces to largely increase the sampling effort, and decrease significantly the efficiency of the sampling for commercial species. It is also stressed that no precision target could be reached for Elasmobranches. Therefore, no minimum number or sampling strategy should be associated to the collection of all the "sharks" species reported in the new Appendix VII."
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.12 MEMBER STATE : LATVIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Mostly
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) SGRN recognizes the MS for its effort in compiling the NP in	
good accordance with the Guidelines. The specific comments	
and observations of SGRN are given below.	
(b) Detential accurace of bias and means to mitirate them abound	
(b) Potential sources of bias and means to mitigate them should	
be described data quality evaluation -sections of the NP.	
(c) See General comment 2	
(d) Overall SGRN feels that the MS has mostly complied	
with the guidelines regarding the description of the	
collection of economic fleet variables, clarifications need to	
be provided concerning the methodologies used for	
estimation of final results.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that this section has followed the guidelines.
II Organisation of NP	SGRN considers that this section has followed the guidelines.
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	MS is asked to clarify if there really are no inactive vessels are in Latvia
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to provide used methodology for estimation of capital costs and imputed value of unpaid labour. MS is asked to clarify the calculations of FTEs and if data fuel consumption is kept in the logbooks. MS is asked to clarify if the population is based on enterprises or vessels.
III.B.2 Estimation	MS is asked to clarify how it deals with the case of low non- response rates in the case of census collection.
III.B.3 Data Quality Evaluation	MS is asked to clarify how it deals with the case of low non- response rates in the case of census.
III.B.4 Data Presentation	MS is asked to clarify when data beyond 2012 will be available.
III.B.5 Regional Co-ordination	No comments
III.B.6 Derogations and Non Conformities	Not applicable
III.C Biological – Metier Related Variables	SGRN considers that this section has followed the guidelines mostly.
III.C.1 Data Acquisition	SGRN considers that this section has followed the guidelines
III.C.2 Estimation Procedure	SGRN considers that this section has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that this section partly has followed the guidelines

III.C.4 Data Presentation	MS should describe potential sources of bias and how to mitigate them. MS should elaborate which methods are used for data quality evaluation before COST tools will be acquired.
III.C.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
III.D Biological – Recreational Fisheries	SGRN considers that this section has followed the guidelines mostly.
III.D.1 Data Acquisition	At present data is collected from licensed fishermen only. A part of the anglers do not need license. Catches of salmon, eel and cod in angling are evidently small. SGRN accepts this approach.
III.D.2 Estimation Procedures	It is unclear if and how the catches are raised (III.D.1 vs. III.D.2). MS should explain in this section if the catches are raised or not. In case of raising MS should present the description.
III.D.3 Data Quality Evaluation	MS should describe potential sources of bias and how to mitigate them.
III.D.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.D.6 Derogations and Non Conformities	MS asks derogation on sampling cod data due to negligible catches. SGRN accepted this in 2009 and can be accepted for present NP.
III.E Biological – Stock Related Variables	SGRN considers that this section has followed the guidelines.
III.E.1 Data Acquisition	SGRN considers that this section has followed the guidelines
III.E.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.E.3 Data Quality Evaluation	MS should describe potential sources of bias and how to mitigate them.
III.E.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.E.5 Derogations and Non Conformities	Derogation on sampling whitefish, referring on low catch – Derogation was accepted by SGRN in 2009. Latvia is asking for derogation to collect information on

	number of ascending salmon individuals. Such investigations have not been performed in Latvia previously, have not been used in the stock assessment and these data collection imply significant financial contributions and expertise Derogation on ascending salmon river monitoring – also was accepted by SGRN in 2009. SGRN agrees.
III.F Transversal Variables	SGRN feels that MS has complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	No comments
III.F.3 Landings	No comments
III.G Research Surveys at Sea	SGRN considers that this section has followed the guidelines.
III.G.1 Planned Surveys	SGRN confirms that all surveys are in the current list of eligible surveys
III.G.2 Modification in the Surveys	 Baltic International Acoustic Survey (autumn) (BIAS) will be performed also in the 12 nm zone of Latvian economic zone. Change of vessel in SPRAS survey is planned. SGRN accepts the modifications.
III.G.3 Data Presentation	SGRN considers that this section has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	MS is asked to clarify why salmon aquaculture is not mentioned in the text but in table IV.A.1. and no data collection applied.
IV.A.2 Data Acquisition	Not Applicable

IV.A.3 Estimation	Not Applicable
IV.A.4 Data Quality	Not Applicable
IV.A.5 Presentation	Not Applicable
IV.A.6 Regional Co-ordination	Not Applicable
IV.A.7 derogation and Non Conformities	Not Applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines
IV.B.1 Data Acquisition	The consistency of the sampling description in different section has to be checked by MS (especially IV.B.1 and IV.B.1.(e)). Clarification needed of definition of financial cost MS has to clarify how the number of hours is collected and how the FTE (national) is calculated. MS has to provide a methodology how to calculate imputed value of unpaid labor MS have to notice that information is provided in section IV.B.1 (d) and should be in section IV.B.1 (c). The population should be in accordance with NACE Rev. 3, group 10.2. MS should give a description of the data source "administrative data/sources". It is unclear who is collecting the data for enterprises with less than 50 employees. Information has to be provided by MS in NP concerning information how the consistency of data coming from different data sources will be ensured. The MS should clarify whether there are information about targets used to determine the sample size. For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing
IV.B.2 Estimation	Description is not sufficient. It has to be more specifically. Method has to be described in the NP how MS is going to estimate variables in the case of census and non-response
IV.B.3 Data Quality Evaluation	MS is asked to provide more detailed and clear information in the NP.
IV.B.4 Data Presentation	When are 2012 data available?

IV.B.5 Regional Co-ordination	Not Applicable
IV.B.6 Derogation and Non Conformioties	Not Applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that this section has followed the guidelines.
VI Module for the Management and Use of Data	SGRN considers that this section has followed the guidelines partly. A substantial part of the information which should be given in this section of the NP were scattered elsewhere in the report. E.g. quality control and validation of the data and use of data. MS should follow the guidelines in structuring their NP.
VII Follow up of STECF Recommendations	SGRN considers that this section has followed the guidelines.
VIII List of Derogations	SGRN considers that this section has followed the guidelines.
IX List of Acronyms and Abbreviations	SGRN considers that this section has followed the guidelines.
X Comments, Suggestions and Reflections	SGRN considers that this section has followed the guidelines.
XI References	SGRN considers that this section has followed the guidelines.
XII Annexes	SGRN considers that this section has followed the guidelines.

1.13 MEMBER STATE : LITHUNIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?	Yes
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Mostly
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over	Yes
Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by RCM's	res
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	<mark>Mostly</mark>
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
(a) SGRN recognizes the MS for its effort in compiling the NP in good accordance with the Guidelines. The specific comments and observations of SGRN are given below.	
(b) See General comment B3	
(c) Overall SGRN feels that the MS has done a god job and mostly complied with the guidelines regarding the description of the collection of economic fleet variables, clarifications on data collections need to be provided.	
(d) MS is not required to provide data on the aquaculture sector.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has mostly followed the Guidelines
II Organisation of NP	SGRN considers that MS has mostly followed the Guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines.
III.B.1 Data Acquisition	MS is asked to provide more detailed information on how capital value, FTE National and Imputed value of unpaid labor are calculated.
	MS is asked to follow STECF/SGECA 09-02 recommendation for clustering more thoroughly. In particular the importance of fleet segments should be assessed in terms of landings and effort.
	MS is asked to specify the procedures implemented to insure consistency.
III.B.2 Estimation	No special comments.
III.B.3 Data Quality Evaluation	No special comments.
III.B.4 Data Presentation	No special comments.
III.B.5 Regional Co-ordination	MS is asked to check the list of RCM recommendations and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities	No special comments.
III.C Biological – Metier Related Variables	SGRN considers that MS has mostly followed the Guidelines
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the Guidelines Type of data collection is not fully described by the metiers

	and sampling strategies. MS to provide more detailed information
III.C.2 Estimation Procedure	SGRN considers that MS has partly followed the Guidelines The descriptions of III.C.2 and III.C.3. are mixed up. MS should revise the these sections
III.C.3 Data Quality evaluation	SGRN considers that MS has mostly followed the Guidelines The descriptions of III.C.2 and III.C.3. are mixed up. MS should revise the these sections
III.C.4 Data Presentation	SGRN considers that MS has partly followed the Guidelines More explanations are needed according to Guidelines (e.g. when data will be available for end users, the time lag with respect to the reference year, and confidentiality of the data).
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the Guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the Guidelines
III.D Biological – Recreational Fisheries	SGRN considers that MS has partly followed the Guidelines
III.D.1 Data Acquisition	SGRN considers that MS has partly followed the Guidelines Salmon in Baltic Sea is not listed in NP, but should be according .to regulation, together with cod and eel. MS to update the NP
III.D.2 Estimation Procedures	SGRN considers that MS has partly followed the Guidelines The raising methods are not described in NP MS to present the estimation procedures planned.
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the Guidelines
III.D.4 Data Presentation	SGRN considers that MS partly has followed the Guidelines The MS does not present any info where and when the data will be presented (MS refers on eel pilot study only) MS to update the section
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the Guidelines
III.D.6 Derogations and Non Conformities	No derogations demanded
III.E Biological – Stock Related Variables	SGRN considers that MS has mostly followed the Guidelines
III.E.1 Data Acquisition	SGRN considers that MS has followed the Guidelines

III.E.2 Estimation Procedures III.E.3 Data Quality Evaluation III.E.4 Regional Co-ordination III.E.5 Derogations and Non	SGRN considers that MS has mostly followed the Guidelines The raising methods are not comprehensively described MS to provide more detailed information SGRN considers that MS has partly followed the Guidelines MS does not provide the clear overview on quality evaluation. MS to provide more detailed information SGRN considers that MS has followed the Guidelines No derogations demanded
Conformities III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines.
III.F.1 Capacity	No special comments.
III.F.2 Effort	MS is asked to provide the month in which data will be available. MS is asked to comply with DCF requirements regarding derogations.
III.F.3 Landings	No special comments.
III.G Research Surveys at Sea	SGRN considers that MS has mostly followed the Guidelines
III.G.1 Planned Surveys	SGRN considers that MS has mostly followed the Guidelines
	Table III.G.1 does not give a full information on planned surveys. MS to explain: 1) how many "Days at sea are planned" for each trip, 2) include codes of surveys (e.g . BITS1q)
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the Guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the Guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the Guidelines
III.G.5 Derogation and Non Conformities	No derogations demanded
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	

IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	MS is asked to describe production of salmon and eel mentioned in table IV.A. 1. Collection of data for these species is compulsory.
IV.A.2 Data Acquisition	Not applicable
IV.A.3 Estimation	Not applicable
IV.A.4 Data Quality	Not applicable
IV.A.5 Presentation	Not applicable
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	Not applicable
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked for clarification on how the consistency of data coming from different data sources will be ensured.
IV.B.2 Estimation	No comments
IV.B.3 Data Quality Evaluation	No comments
IV.B.4 Data Presentation	No comments
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformities	Not applicable
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the Guidelines

VI Module for the Management and Use of Data	SGRN considers that MS has partly followed the Guidelines. Method of validation and completeness of the primary data and aggregated, should be described by the MS Also, see General comment B3.
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the Guidelines
VIII List of Derogations	No information on possible historical derogations is available in NP. MS to provide the respective explanation
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the Guidelines
X Comments, Suggestions and Reflections	N/A
XI References	SGRN considers that MS has followed the Guidelines
XII Annexes	SGRN considers that MS has followed the Guidelines

1.14 MEMBER STATE : MALTA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	Vee
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) The Maltese national proposal for the collection of fisheries is in general in accordance with EC 199/08 and Commission Decision 93/2010. The proposal is well written, comprehensive and in line with the guidelines. The NP is of a high quality MS is encouraged to maintain the progress done since its implementation in 2005.	
(b) SGRN notes that MS has decreased its participation in international co-ordination and scientific meetings and this may effect negatively the implementation of the fisheries data collection program.	
(c) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of economic fleet variables, further information on estimation procedures, data sources and data quality evaluation needs to be provided.	
(b) SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of data on the aquaculture and processing sectors, more detailed description on estimation procedures need to be provided.	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the guidelines
II Organisation of NP	SGRN considers that MS has followed the guidelines Table II_B_1; MS plan to attend all the important meetings. Ms should complete the table with info on RFMO (e.g
	GFCM) who is planning the meeting. For example GFCM is not organising the medits meeting and the box should be left blank. There are some duplications in the table. All meetings do further not occur every year. MS need to update table.
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	 MS is asked to provide further information on methods used to calculate values of quotas and fishing rights. MS is asked to clarify the discrepancy in dates regarding the base of the target population. MS is asked to provide more information on data sources and consistency when is derived from different sources. MS is asked to check consistency between sampling techniques in the text and table III.B.1.
III.B.2 Estimation	MS is asked to provide further information on the methods used to produce estimates by adding formulas and more references to estimation techniques used
III.B.3 Data Quality Evaluation	MS is asked to provide further information on the methods used to produce quality measures by adding formulas and more references to the techniques used
III.B.4 Data Presentation	MS is asked to provide reference years
III.B.5 Regional Co-ordination	Not applicable
III.B.6 Derogations and Non Conformities	Not applicable

III.C Biological – Metier Related Variables	
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly
	MS should list all G1 and G2 specis, including sharks in table III_C_5. For metier based sampling all encountered G1 and G2 species need to be measured for length. See general comment MS to update table
	MS to check some of the coding (MISC) which should correspond to the PGMed codes
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	MS ask for derogation to sample most G2 species. SGRN stress that MS need to sample all G1 and G2 species encountered for length and do not think that the derogation is justified. The exemption rules (<200 tonnes, <10%) är only applicable for stock related variables.
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines MS have no recreational fishery for eel and did not have to compile a eel management plan (EC) No 1100/2007. There are however a recreational fishery for BFT. MS claims that this fishery will be forbidden from 2010 onwards but there is no reference to a legal document.
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.D.6 Derogations and Non Conformities	Justification for derogation from sampling eel is considered acceptable. For BFT MS should provide more in formation on the legal basis of the prohibition. Before this is done no derogation could be considered justified.

III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly
	Frame population not well described. MS should update text All species in the area, including sharks, listed in appendix VII shlould be included in the table. MS should update table Stock/area should correspond to GSA
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.E.5 Derogations and Non Conformities	All asked derogations are already covered by the exemption rules in 93/2010. MS do not have to sample these species
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	MS is asked to provide further information on the methods used to estimate variables and produce quality measures by adding formulas and more references to the techniques used.
III.F.3 Landings	MS is asked to provide further information on the methods used to estimate variables and produce quality measures by adding formulas and more references to the techniques used.
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines Modifications concern establishing "contingency stations' to sample when original stations cannot be sampled. Modifications suggested are considered acceptable.
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines Partly MS need to inform on when data is present for end users
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines No international database for MEDIAS
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines

IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	SGRN feel that MS has mostly complied with the guidelines.
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	No Comments
IV.A.2 Data Acquisition	MS is asked to give information in table IV.A.3 which error type is assessed and with accuracy indicator is used. Table IV.A.2 lists 10 companies, but in the text of the NP only 6 companies are mentioned. To be clarified by MS.
IV.A.3 Estimation	MS is asked to take non response into consideration. To be addressed by MS.
IV.A.4 Data Quality	MS is asked to take non response into consideration. To be addressed by MS.
IV.A.5 Presentation	MS is asked to clarify when final data will be available for each reference year. Confidentiality problems shall be addressed.
IV.A.6 Regional Co-ordination	No Comments
IV.A.7 derogation and Non Conformities	No Comments
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has mostly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked to provide type of error and accuracy indicator in table IV.B.2. Debt is mandatory to be collected in absolute terms and not as a ratio. MS to clarify.
IV.B.2 Estimation	MS shall follow DCF regulation. Data collection is mandatory for each variable and not for variable groups. Also e.g. other fixed costs are not mentioned in the DCF. It remains unclear in some cases, why in the case of census estimation will be used. If non-response is expected that issue has to be addressed.
IV.B.3 Data Quality Evaluation	MS is asked to give more detailed information on methodology of data quality evaluation.
IV.B.4 Data Presentation	MS is asked to give more precise information when final data will be available.

	MS is asked to address confidentiality problems.
IV.B.5 Regional Co-ordination	No Comments
IV.B.6 Derogation and Non Conformities	For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. MS to address this in its NP.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.15 MEMBER STATE : NETHERLANDS PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	100
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by	Yes
RCM's	165
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
 (a) MS has put a lot of effort in compiling the NP 2011-2013. The NP is clearly defining the data collection which is proposed to be carried out by MS for the period 2011- 2013. 	
(b) The regional structure is strictly followed in the report and required by the guidelines. The uniform structure of the NP of all MS facilitates the evaluation of the report by SGRN; however this is leading to unnecessary repetition of text.	
(c) Version 3b has been evaluated, although this seems to appear not to be the final version available	
(d) Overall SGRN feels that the MS has done a good job and mostly complied with the guidelines regarding the description of the collection of economic fleet variables, but some clarifications need to be provided concerning the explanation of the methods applied and the related tables	
the explanation of the methods applied and the related	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has followed the guidelines
II Organization of NP	SGRN considers that MS has mostly followed the guidelines
	National Correspondent is not stated. SGRN asks MS to state who is the National Correspondent
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	SGRN considers that MS has followed the guidelines
III.B Economic Variables	SGRN feels that the MS mostly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to look over the tables and make sure they are consistent with each other, the guidelines and the DCF. MS is asked to provide information on inactive vessels.
III.B.2 Estimation	No comments
III.B.3 Data Quality Evaluation	No comments
III.B.4 Data Presentation	No comments
III.B.5 Regional Co-ordination	No comments
III.B.6 Derogations and Non Conformities	Not applicable
III.C Biological – Metier Related Variables	North Sea & Eastern Atlantic
III.C.1 Data Acquisition	SGRN considers that MS has followed mostly the guidelines

	Fishing activities with no information of region has been listed as metiers with unknown characteristics. This is mentioned in the text. Merging across regions occurs (explained in text) as is the case in the present program. "Euro cutters" is not sampled. Only 2011 as sampling year (2012 and 2013 is missing) Only 2011 as sampling year (2012 and 2013 is missing). No copy of intended number of trips sampled from C.3 and no time stratification indication. SGRN asks MS to provide the updated information
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has followed mostly the guidelines No mention of bias in coverage (temp, spatial), vessel selection etc.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines MS asks derogation for not sampling MIS_UND_0_0_0 (information in logbook is missing) SGRN recognizes this is an issue in several MS. SGRN suggests that this group is classified as an unknown métier and to investigate the compliance issue
III.C Biological – Metier Related Variables	North Atlantic
III.C.1 Data Acquisition	SGRN considers that MS has followed mostly the guidelines In Table III.C.4 the planned number of trips is missing. In the codification and naming convention, MS has used an incorrect labelling of fishing grounds (has NEA before grounds) It is unclear if the small scale vessels are covered by the target and frame population. MS needs to bring clarification to be brought on the sampling coverage of small scale vessels.

III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
	Concise description for pelagic trawlers, which is the only metier operating in the region.
III.C.3 Data Quality evaluation	Reference to manuals and use of COST.
	SGRN asks MS to give the references of the manuals used
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed mostly the guidelines
	Recommendation from the NS &EA are inserted in this section. No mention of any NEA recommendations.
	SGRN asks MS to provide an update of the Recommendations NEA
III.C.6 Derogation and Non Conformities	SSC_DEM_70-99_0_0 : derogation sought for sampling landings and discards because of no access to the catches and vessels by NL;
	SGRN accepts the justification for the derogation
III.C Biological – Metier Related Variables	Other regions
	SGRN considers that MS has followed the guidelines
III C 1 Data Acquisition	
III.C.1 Data Acquisition	The sampling of the landings done in metier OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is described in the Spanish National Program.
III.C.1 Data Acquisition III.C.2 Estimation Procedure	OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is
	OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is described in the Spanish National Program.
III.C.2 Estimation Procedure	OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is described in the Spanish National Program. No Comments
III.C.2 Estimation Procedure III.C.3 Data Quality evaluation III.C.4 Data Presentation	OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is described in the Spanish National Program. No Comments No Comments
III.C.2 Estimation Procedure III.C.3 Data Quality evaluation	OTM_SPF_>=40_0_0 at Spanish ports (Canarias) is described in the Spanish National Program. No Comments No Comments No Comments

III.C.6 Derogation and Non Conformities	RCM LD to develop a regional sampling plan together before the next RCM. SGRN recognizes that RCM-LD has just be established, supports the initiative of the regional approach, and realizes that it will take some time to develop such a program. SGRN considers that a derogation can be accepted for 2011 but not for the following years. If a recommended derogation for 2011 is accepted, MS should resubmit the NP for 2012.
III.D Biological – Recreational Fisheries	North Sea & Eastern Atlantic
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines There is no (not yet) regional coordination, since the recreational fisheries differ considerable between MS.
III.D.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines no derogations, no NC MS has no recreational fisheries in North Atlantic and other regions
III.E Biological – Stock Related Variables	North Sea
III.E.1 Data Acquisition	SGRN considers that MS has followed mostly the guidelines
	The section III.E.1.C – Target and frame population- is missing
	The description of the sampling protocol is assumed to be complete although reference should be made to the section of metiers related variables where protocols are described.
	SGRN asks MS to supply the missing information

III.E.2 Estimation Procedures SGRN considers that MS has followed the guidelines III.E.3 Data Quality Evaluation SGRN considers that MS has followed the guidelines III.E.4 Data presentation SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has followed the guidelines III.E.6 Derogations and Non Conformities SGRN considers that MS has followed the guidelines III.E.8 Ibiological – Stock Related Variables North Eastern Atlantic III.E.1 Data Acquisition SGRN considers that MS has followed partly the guidelines information on target and frame population, type of data collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. SGRN considers that MS has followed mostly the guidelines SGRN considers that MS has followed mostly the guidelines III.E.2 Estimation Procedures SGRN considers that MS has followed mostly the guidelines SGRN considers that MS has followed mostly the guidelines SGRN considers that MS has followed mostly the guidelines III.E.3 Data Quality Evaluation SGRN considers that MS has followed mostly the guidelines III.E.3 Data Quality Evaluation SGRN considers that MS has followed mostly the guidelines III.E.3 Regional Co-ordination SGRN considers that MS has followed the guidelines		
III.E.4 Data presentation SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has followed the guidelines III.E.6 Derogations and Non Conformities SGRN considers that MS has followed the guidelines III.E.8 Biological – Stock Related Variables North Eastern Atlantic III.E.1 Data Acquisition SGRN considers that MS has followed partly the guidelines wrong region is given for Micromesistius poutassou Information on target and frame population, type of data collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. SGRN considers that MS has followed mostly the guidelines III.E.2 Estimation Procedures SGRN considers that MS has followed mostly the guidelines Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases thational derived biological parameters are representative for the national cach. Concerns that only part of Stock is being covered. III.E.3 Data Quality Evaluation SGRN considers that MS has followed the guidelines III.E.4 data presentation SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has not followed t	III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has followed the guidelines III.E.6 Derogations and Non Conformities SGRN considers that MS has followed the guidelines III.E Biological – Stock Related Variables North Eastern Atlantic III.E.1 Data Acquisition SGRN considers that MS has followed partly the guidelines Wrong region is given for Micromesistius poutassou Information on target and frame population, type of data collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. III.E.2 Estimation Procedures SGRN considers that MS has followed mostly the guidelines Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national data cach. Concerns that only part of Stock is being covered. SGRN considers that MS has followed mostly the guidelines III.E.3 Data Quality Evaluation SGRN considers that MS has followed the guidelines III.E.4 data presentation SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has not followed the guidelines	III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.E.6 Derogations and Non Conformities SGRN considers that MS has followed the guidelines III.E Biological – Stock Related Variables North Eastern Atlantic III.E.1 Data Acquisition SGRN considers that MS has followed partly the guidelines Wrong region is given for Micromesistius poutassou Information on target and frame population, type of data collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. SGRN considers that MS has followed mostly the guidelines SGRN considers that MS has followed mostly the guidelines III.E.2 Estimation Procedures SGRN considers that MS has followed mostly the guidelines Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. Concerns that only part of Stock is being covered. SGRN considers that MS has followed mostly the guidelines III.E.3 Data Quality Evaluation SGRN considers that MS has followed mostly the guidelines III.E.4 data presentation SGRN considers that MS has followed the guidelines MS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.4 Data presentation	SGRN considers that MS has followed the guidelines
Conformities North Eastern Atlantic III.E Biological – Stock Related Variables SGRN considers that MS has followed partly the guidelines III.E.1 Data Acquisition SGRN considers that MS has followed partly the guidelines Wrong region is given for Micromesistius poutassou Information on target and frame population, type of data collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. SGRN asks MS to provide the updated information SGRN considers that MS has followed mostly the guidelines III.E.2 Estimation Procedures SGRN considers that MS has followed mostly the guidelines Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases that covering part of the stock. This is in most cases that covering part of the stock. This is in most cases that covering part of the stock. This is being covered. III.E.3 Data Quality Evaluation SGRN considers that MS has followed mostly the guidelines III.E.4 data presentation SGRN considers that MS has followed the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has not followed the guidelines MS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
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collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during the revision of the program. SGRN asks MS to provide the updated information III.E.2 Estimation Procedures Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. Concerns that only part of Stock is being covered. III.E.3 Data Quality Evaluation SGRN considers that MS has followed mostly the guidelines III.E.4 data presentation SGRN considers that MS has followed mostly the guidelines III.E.5 Regional Co-ordination SGRN considers that MS has not followed the guidelines MS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.1 Data Acquisition	Wrong region is given for Micromesistius poutassou
III.E.2 Estimation ProceduresSGRN considers that MS has followed mostly the guidelinesIII.E.2 Estimation ProceduresSection III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. Concerns that only part of Stock is being covered.III.E.3 Data Quality EvaluationSGRN considers that MS has followed mostly the guidelinesIII.E.4 data presentationSGRN considers that MS has followed the guidelinesIII.E.5 Regional Co-ordinationSGRN considers that MS has not followed the guidelinesMS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place		collection, sampling stratification and allocation scheme is missing. MS states this information will be provided during
III.E.2 Estimation ProceduresguidelinesSection III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. Concerns that only part of Stock is being covered.III.E.3 Data Quality EvaluationSGRN considers that MS has followed mostly the guidelinesIII.E.4 data presentationSGRN considers that MS has followed the guidelinesIII.E.5 Regional Co-ordinationSGRN considers that MS has not followed the guidelinesMS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place		SGRN asks MS to provide the updated information
parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. Concerns that only part of Stock is being covered.III.E.3 Data Quality EvaluationSGRN considers that MS has followed mostly the guidelinesIII.E.4 data presentationSGRN considers that MS has followed the guidelinesIII.E.5 Regional Co-ordinationSGRN considers that MS has not followed the guidelinesMS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.2 Estimation Procedures	-
III.E.3 Data Quality EvaluationguidelinesIII.E.4 data presentationSGRN considers that MS has followed the guidelinesIII.E.5 Regional Co-ordinationSGRN considers that MS has not followed the guidelinesMS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place		parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch.
III.E.5 Regional Co-ordination SGRN considers that MS has not followed the guidelines MS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.3 Data Quality Evaluation	-
MS should list clearly all co-ordination with other member states and state whether a bi lateral agreement is in place	III.E.4 data presentation	SGRN considers that MS has followed the guidelines
states and state whether a bi lateral agreement is in place	III.E.5 Regional Co-ordination	SGRN considers that MS has not followed the guidelines
SGRN asks MS to provide the undated information		-
		SGRN asks MS to provide the updated information.

III.E.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines	
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines	
III.F.1 Capacity	No comments	
III.F.2 Effort	MS is asked to justify the derogations concerning the non- collection of effort variables for vessels <8 meters	
III.F.3 Landings	No comments	
III.G Research Surveys at Sea		
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines	
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines	
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines	
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines	
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry		
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS mostly complied with the guidelines	
IV.A.1 General Description of the Aquaculture Sector	No comments	

IV.A.2 Data Acquisition	The target population should cover all enterprises under NACE Code 05.02: Fish farming. Definition of capital costs should be provided. In the text only data sources panel data is mentioned while table refer to several data sources. More detailed methodological description on sampling design should be provided.
IV.A.3 Estimation	More detailed methodological description should be provided.
IV.A.4 Data Quality	More detailed methodological description on estimation of totals should be provided. More detailed methodological description on evaluation of bias should be provided.
IV.A.5 Presentation	No comments
IV.A.6 Regional Co-ordination	No comments
IV.A.7 derogation and Non Conformities	No comments
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS mostly complied with the guidelines
IV.B.1 Data Acquisition	Definition of the variables should follow the regulation and especially method for estimation capital costs should be provided. MS should clarify who carries out data collection on under 50 employment enterprises.
IV.B.1 Data Acquisition	especially method for estimation capital costs should be provided. MS should clarify who carries out data collection on under
	especially method for estimation capital costs should be provided. MS should clarify who carries out data collection on under 50 employment enterprises. The sampling scheme to be described. Reference to national statistics but not clear if other sources
IV.B.2 Estimation	especially method for estimation capital costs should be provided. MS should clarify who carries out data collection on under 50 employment enterprises. The sampling scheme to be described. Reference to national statistics but not clear if other sources used. To be clarified who carries out the sample survey. Only reference to national statistics. Further information on
IV.B.2 Estimation IV.B.3 Data Quality Evaluation	especially method for estimation capital costs should be provided. MS should clarify who carries out data collection on under 50 employment enterprises. The sampling scheme to be described. Reference to national statistics but not clear if other sources used. To be clarified who carries out the sample survey. Only reference to national statistics. Further information on variability estimate.

V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines
VIII List of Derogations	SGRN considers that MS has followed the guidelines
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.16 MEMBER STATE : POLAND PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?	Yes
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of the data for scientific analyses purposes?	Yes
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by RCM's	Yes
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP(a) SGRN recognizes the MS for its effort in compiling the NP in good accordance with the Guidelines. The specific comments and observations of SGRN are given below.	
(b) See General comment 2.	
(c) Overall SGRN feels that the MS has partly complied with the guidelines regarding the description of the collection of economic fleet variables, but further explanations need to be provided concerning the estimation procedures applied and data quality evaluations.	
(d) Overall SGRN feels that the MS has done a good job and mostly complied with the guidelines regarding the analysis of the Aquaculture and Processing sectors variables.	

SECTION - MODULE	MAJOR SGRN COMMENT	
I General Framework	SGRN considers that MS has followed the Guidelines	
II Organisation of NP	STECF considers that MS has followed the Guidelines	
III Module on the Evaluation of the Fishing Sector		
III.A General Description of the Fishing Sector		
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines	
III.B.1 Data Acquisition	MS is asked to clarify what methodology is used to estimate the variables which are not clearly defined in the DCF. MS has to check and clarify if data collection will cover also the fleet fishing in other regions. According to EU Commission decisions economic variables should be reported for each supra-region. MS is required to clarify if they cluster among different supra-regions (i.e. "Baltic Sea, North Sea and Eastern Arctic, and North Atlantic" and "Other regions") MS is asked to clarify and provide information on methods used to obtain consistency among data coming from different data sources.	
III.B.2 Estimation	MS is required to both provide more information on the estimation methodology currently used and to come up with a more appropriate estimation technique as required by the guidelines (Section on imputation of non-responses/non- response adjustments) in the case of census.	
III.B.3 Data Quality Evaluation	MS is required to provide more information on the measures of accuracy currently used and follow guidelines.	
III.B.4 Data Presentation	MS is asked to clarify the fleet segments for which confidentiality problems usually arise.	
III.B.5 Regional Co-ordination	No Comments	
III.B.6 Derogations and Non Conformities	MS is asked to clarify the fleet segments for which confidentiality problems usually arise.	
III.C Biological – Metier Related Variables	SGRN considers that MS has mostly followed the Guidelines	

III.C.1 Data Acquisition	1. MS should check for inconsistency between Tables III.C.2 and III.C.3. (e.g. OTB_DEF_32_104_0_0 is missing in III.E.3.)
III.C.2 Estimation Procedure	SGRN considers that this section has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that this section has followed the guidelines
III.C.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.C.6 Derogation and Non Conformities	SGRN considers that this section has followed the guidelines
III.D Biological – Recreational Fisheries	SGRN considers that MS mostly has followed the Guidelines.
III.D.1 Data Acquisition	 2. MS is planning to sample cod, while for eel and salmon the derogations are demanded. The chronology of planned work is not specified in NP. MS should provide the timeframe of planned data collection.
III.D.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that this section has followed the guidelines
III.D.4 Data Presentation	SGRN considers that this section has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that this section has followed the guidelines
III.D.6 Derogations and Non Conformities	3. Eel sampling: sampling is covered by the framework of Polish Eel Management Plan following Council Regulation 1100/2007 adopting Eel Management Plan. Salmon sampling: recreational fishery does not occur.
III.E Biological – Stock Related Variables	SGRN considers that MS partly has followed the Guidelines
III.E.1 Data Acquisition	SGRN considers that MS mostly has followed the Guidelines 4. Share of Sander <i>luciopercaca</i> catches in EU landings missing in Table III.E.1- MS to update the Table III.E.1 5. Maturity estimation of sprat and flounder are not planned by MS according to Table III.E.2. The explanation in NP (For

	other species maturity records from Politic survey do not
	other species maturity records from Baltic survey do not much well with spawning time and will be only useful for maturity estimation) is not clear.
	See also General comment 2. – MS to clarify why sprat and flounder maturity estimation is not planned in NP
	6. Fecundity estimations are not planned by MS according to Table III.E.2. MS to explain.
III.E.2 Estimation Procedures	SGRN considers that this section has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that this section partly has followed the guidelines
	7. Data quality evaluation methods and potential sources of bias are not described in NP. The MS is expecting that "for cod, herring, sprat, and flounder the precision level 3 will be achieved. Similarly, maturity and sex ratio will be estimated with required precision for above species ". However the data quality evaluation methods and potential sources of bias are not described in NP. Moreover, it is not clear, how the maturity of sprat will be estimated with required precision, when MS is not planning the maturity sampling for sprat and flounder (see comment 6) MS should update the NP with explanatory information
III.E.4 Regional Co-ordination	8. Description of regional and international coordination (III.E.4) is missing in NP
III.E.5 Derogations and Non	MS to fill in the missing information No derogations demanded
Conformities	
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	MS is asked to provide information on data quality evaluation
III.F.3 Landings	
III.G Research Surveys at Sea	SGRN considers that MS has followed the Guidelines
III.G.1 Planned Surveys	SGRN considers that all surveys planned by MS are in the current list eligible surveys
III.G.2 Modification in the Surveys	N/A

III.G.3 Data Presentation	SGRN considers that this section has followed the guidelines	
III.G.4 Regional Co-ordination	SGRN considers that this section has followed the guidelines	
III.G.5 Derogation and Non Conformities	No derogations demanded	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry		
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines	
IV.A.1 General Description of the Aquaculture Sector	Not special comments	
IV.A.2 Data Aquisition	Not special comments	
IV.A.3 Estimation	In case of low response rate, according to the guidelines, the representativeness should be evaluated.	
IV.A.4 Data Quality	No Comments	
IV.A.5 Presentation	Not special comments	
IV.A.6 Regional Co-ordination	Not special comments	
IV.A.7 derogation and Non Conformities	Not applicable	
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines	
IV.B.1 Data Acquisition	Not special comments	
IV.B.2 Estimation	The estimation method for non-respondents with no prior information to be provided.	

IV.B.3 Data Quality Evaluation	In case of low response rate, according to the guidelines, the representativeness should be evaluated.	
IV.B.4 Data Presentation	Not special comments	
IV.B.5 Regional Co-ordination	Not special comments	
IV.B.6 Derogation and Non Conformities	Not applicable	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the Guidelines	
VI Module for the Management and Use of Data	SGRN considers that MS has followed the Guidelines	
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the Guidelines	
VIII List of Derogations	SGRN considers that MS has mostly followed the Guidelines 9. MS has not presensted the historical list of derogations applied for. MS is asked for update the NP with relevant list or explain the absence.	
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the Guidelines	
X Comments, Suggestions and Reflections	N/A	
XI References	N/A	
XII Annexes	SGRN considers that MS has followed the Guidelines	

1.17 MEMBER STATE : PORTUGAL

PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?	Yes
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of the data for scientific analyses purposes?	Yes
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Partly
7 Did MS take into account the recommendations made by RCM's	No
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP(a) All regions should be described independently following the guidelines.	
(b) No reference is made to any RCM recommendation, although MS participates to the meetings.	
(c) Overall SGRN feels that the MS has only partly complied with the guidelines regarding the description of the collection of economic fleet variables, further information needs to be provided concerning how to deal with data inconsistencies and estimation methodologies.	
(d) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of transversal variables, further information needs to be provided regarding the collection of effort variables for vessels less than 10 meters and the collection time frame.	
(e) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of data on the aquaculture and processing sectors, more detailed description on methodologies needs to be provided on the estimation procedures	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	Ok
II Organisation of NP	It is not clear which institutes are involved in collection of economic variables, aquaculture and processing industry data in Mainland. To be clarified by MS.
	The distinction between Azores and mainland makes the NP proposal difficult to review.
	Distinction of regions not in line with the guidelines. No table of RCM recommendations and follow-up actions presented in the report. Regions mentioned in Table III.A.1 and absent of the report are : • Mediterranean and Black Sea
	 Other regions (Antarctic, WECAF Pacific ocean)
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	No description of fisheries in the Mediterranean and Black Sea, Atlantic, WECAF and Pacific ocean.

SECTION - MODULE	MAJOR SGRN COMMENT
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines.
III.B.1 Data Acquisition	MS is asked to provide information on the economic section for the following supra-regions: Mediterranean and "other regions".
	MS is required to clarify the method used to calculate capital value, Value of quota and fishing right, FTE National and Imputed value of unpaid labour. Reference to DCF requirements is missing. MS is asked to provide further information on methods used to ensure data consistency. MS is required to provide information on the methods used to allocate vessels, determine sample size and on sample evolution over time.
III.B.2 Estimation	No special comments.
III.B.3 Data Quality Evaluation	MS is asked to clarify on how data quality is evaluated and measured.

SECTION - MODULE	MAJOR SGRN COMMENT
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines.
III.B.4 Data Presentation	MS takes three year to provide final estimates. MS is asked to justify why this long time is necessary to produce the analysis.
	MS is required to add information on reference years.
III.B.5 Regional Co-ordination	MS is asked to check the list of RCM recommendations and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities	No special comments.

REGION NORTH ATLANTIC

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	Region North Atlantic
	SGRN considers that MS as mostly followed the guidelines.
III.C.1 Data Acquisition	Information on value of landings is missing for some metiers in Table III.C.1.
	MS should not have deleted table III.C.2 even if no merging is applied.
	The linkage between table III.C.3 (column I) and table III.C.4 (column E) is missing.
	Not all species in table III.C.5 have numbers of fish to be measured.
	Tables to be resubmitted by MS.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines.
III.C.6 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
III.D Biological – Recreational Fisheries	Region North Atlantic
III.D.1 Data Acquisition	SGRN considers that MS has not followed the guidelines. MS refers only to blue fin tuna recreational fisheries. No collection of data on recreational fisheries for the other species is planned. No information on recreational fisheries for listed species in the mainland. Information to be brought by MS.
III.D.2 Estimation Procedures	SGRN considers that MS has not followed the guidelines.
III.D.3 Data Quality Evaluation	SGRN considers that MS has not followed the guidelines.
III.D.4 Data Presentation	SGRN considers that MS has not followed the guidelines.
III.D.5 Regional Co-ordination	SGRN considers that MS has not followed the guidelines.
III.D.6 Derogations and Non Conformities	No derogations nor non-conformities listed.
III.E Biological – Stock Related Variables	Region North Atlantic
III.E.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines. Large number of species not planned to be sampled, which have landings above 200 tonnes. On the other hand, MS wishes to sample annually the species of high economic importance, even if tri annual is stated in the Comm. Dec. SGRN agrees with the latter, but recalls the obligations to sample species which landings are over 200 tonnes. The distinction between Azores, Madeira and mainland is done in some tables and not in others (see also comment on section 1). A pilot project for rays together with Spain was recommended by previous RCM NA and LM (2009), so SGRN agrees with the pilot project demanded by MS. A pilot project for sampling glass eel is also demanded, SGRN agrees with the pilot project demanded by MS.
III.E.2 Estimation Procedures	SGRN considers that MS has mostly followed the guidelines. Only a brief description is given and no reference to sampling protocol. MS to improve this section for the revision of NP proposal in 2011.

SECTION - MODULE	MAJOR SGRN COMMENT
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.
III.E.5 Regional Co-ordination	SGRN considers that MS has partly followed the guidelines. No mention of RCM maturity reference table.
	No table of RCM recommendations and follow-up actions presented. Information to be provided by MS.
III.E.6 Derogations and Non Conformities	SGRN notes that there is no need to apply for derogations for stocks falling within the exemption rules.

Region CECAF

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	CECAF
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.k
III.C.5 Regional Co-ordination	NA for the moment
III.C.6 Derogation and Non Conformities	SGRN agrees with the proposal LLD_DWS_0_0_0 for deep water species with drifting long lines as a candidate new entry in Appendix IV of Comm. Dec. 2010/93/EU. SGRN acknowledges that metiers which are important (included in the ranking system) must be listed in the Appendix IV of the Comm. Dec. SGRN recommends MS to propose coding for the 2 metiers where there is no entry in the Appendix IV and discuss this in the RCM LDF.
III.E Biological – Stock Related Variables	CECAF
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines.
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.
III.E.4 Regional Co-ordination	NA for the moment
III.E.5 Derogations and Non Conformities	SGRN notes that there is no need to apply for derogations for stocks falling within the exemption rules.

Region NORTH SEA & EASTERN ARCTIC

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	NORTH SEA & EASTERN ARCTIC
III.C.1 Data Acquisition	SGRN considers that MS has partly followed the guidelines.
	Section on North Sea & Eastern Arctic missing in the text of the report.
	Inconsistencies in the tables to be sorted out, according to the guidelines (See North Atlantic section).
	No sampling protocol found in the report for this region.
III.C.2 Estimation Procedure	SGRN considers that MS has not followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has not followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has not followed the guidelines.
III.C.5 Regional Co-ordination	SGRN considers that MS has not followed the guidelines.
III.C.6 Derogation and Non Conformities	SGRN considers that MS has not followed the guidelines.
III.E Biological – Stock Related Variables	NORTH SEA & EASTERN ARCTIC
III.E.1 Data Acquisition	SGRN considers that MS has partly followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
	Information missing for the region in the text of the report.
	Inconsistencies in the tables to be sorted out, according to the guidelines. For example, stocks listed in Table III.E.2 are absent in Table III.E.1 and III.E.3. Only age sampling is proposed in table 3.E.1 while table 3.E.2 indicates that for some stocks are also planned to be sampled for weight and sex ratio. Some stocks are planned to be sampled, although no landings are reported.
III.E.2 Estimation Procedures	SGRN considers that MS has not followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has not followed the guidelines
III.E.4 Regional Co-ordination	SGRN considers that MS has not followed the guidelines
III.E.5 Derogations and Non Conformities	SGRN considers that MS has not followed the guidelines

Other Regions

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	OTHER REGIONS (ICCAT)
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	MS is requested to provide a separate section for the region.
	In table III.C.1, data on value should be provided for all the metier listed. In table In table III.C.3, the sampling intensity for PS_LPF_TROP as the total number of trips to be sampled do not correspond. In table III.C.5, the target precision must be in accordance to the DCF. MS to resubmit the set of tables.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.

SECTION - MODULE	MAJOR SGRN COMMENT
III.C.5 Regional Co-ordination	NA for the moment
III.C.6 Derogation and Non Conformities	No derogation demanded.
III.E Biological – Stock Related Variables	OTHER REGIONS (ICCAT)
III.E.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	MS is requested to provide a separate section for the region.
	SGRN recommends MS to adjust the tables both for the area / stock, fishing ground, average landings, share in EU TAC reporting the same coding, and consistency between tables. For example in table III.E.1 landings for Xiphias gladius in AN05N is reported two times as 560 tons however the share in EU TAC is different and Stock present under Table III.E.2 should match Table III.E.1 at least with the species selected for sampling. MS to check and update tables accordingly.
	MS should clarify what is considered the target and frame population for ICCAT stocks
III.E.2 Estimation Procedures	SGRN considers that MS has not followed the guidelines.
	SGRN could not assess the procedure used for the region.
III E 3 Data Quality Evaluation	SGRN considers that MS has not followed the guidelines.
III.E.3 Data Quality Evaluation	SGRN could not assess the procedure used for the region.
III.E.4 Regional Co-ordination	NA for the moment
III.E.5 Derogations and Non Conformities	MS requesting derogation for sampling 2 tuna species because of high cost of the specimen. SGRN recommends MS to look for a solution within the RCM Long Distance Fisheries.

ALL REGIONS

SECTION - MODULE	MAJOR SGRN COMMENT	
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines.	
III.F.1 Capacity	No special comments.	
III.F.2 Effort	MS is asked to provide information also on vessels less than 10m.	

SECTION - MODULE	MAJOR SGRN COMMENT	
	MS takes two years to provide final estimates. MS is asked to justify why this long time is necessary to produce the analysis.	
	MS is required to add information on reference years.	
	MS is required to insert a section on regional and international coordination in the NP.	
	MS is required to insert a section on derogations and non conformities in the NP.	
III.F.3 Landings	MS takes two years to provide final estimates. MS is asked to justify why this long time is necessary to produce the analysis.	
	MS is required to add information on reference years.	
	MS is required to insert a section on derogations and non conformities in the NP.	
III.G Research Surveys at Sea	ALL REGIONS	
III.G.1 Planned Surveys	SGRN confirms that all surveys are in the current list of eligible surveys in App. of Comm. Dec. 2010/93/EU.	
	SGRN considers that MS has followed the guidelines.	
III.G.2 Modification in the Surveys	NA	
III.G.3 Data Presentation	Ok	
III.G.4 Regional Co-ordination	Ok	
III.G.5 Derogation and Non Conformities	NA	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	ALL REGIONS	
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines.	
	No comment	

SECTION - MODULE	MAJOR SGRN COMMENT	
IV.A.1 General Description of the Aquaculture Sector		
IV.A.2 Data Aquisition	Methodology/definition for capital costs shold be provide The methodology of estimating unpaid labour cost shou be provided in Technical report.	
IV.A.3 Estimation	No comment	
IV.A.4 Data Quality	No Comment	
IV.A.5 Presentation	Controversial information on the timeline of data collection/publication (IV. A.2.a; IV.A.5). Should be clarified.	
IV.A.6 Regional Co-ordination	No comment	
IV.A.7 derogation and Non Conformities	Not applicable	
IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines.	
IV.B.1 Data Acquisition	Methodology/definition for capital costs shold be provided. The methodology of estimating unpaid labour cost should be provided in Technical report. The data collection for fish processing as secondary activity should be clarified.	
IV.B.2 Estimation	Methodology on estimation totals and variation/bias estimation should be provided.	
IV.B.3 Data Quality Evaluation	No comment	
IV.B.4 Data Presentation	Controversial information on the timeline of data collection/publication (IV. A.2.a; IV.A.5). Should be clarified.	
IV.B.5 Regional Co-ordination	No comment	
IV.B.6 Derogation and Non Conformities	Not applicable	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines. Some inconsistencies between the text and tables to be sorted out.	

SECTION - MODULE	MAJOR SGRN COMMENT	
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines.	
VII Follow up of STECF Recommendations	SGRN considers that MS has not followed the guidelines. No recommendations were reported. MS is recommended to provide the recommendations relevant to the NP proposals and MS responsive actions.	
VIII List of Derogations	SGRN considers that MS has mostly followed the guidelines.	
	The historical derogations and references are missing. To be provided by MS.	
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines.	
X Comments, Suggestions and Reflections	None	
XI References	Ok	
XII Annexes	Ok	

1.18 MEMBER STATE : ROMANIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Mostly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of commercial and recreational fisheries where necessary ?	Yes
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of the data for scientific analyses purposes?	Yes
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by RCM's	Mostly
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Mostly
10 Overall Comments by SGRN on NP	
(a) The Romanian national proposal for the collection of fisheries is in general in accordance with EC 199/08 and Commission Decision 93/2010. SGRN appreciates the improvement that was done by member state taking into consideration that Romania is one of the new member state and this is their second proposal for a national programme.	
(b) MS is encouraged to be involved more in international co- ordination and scientific meetings. Most of the problems encountered in the NP are due to a lack of participation in meetings and the relevant scientific discussions and agreements which are taken at international level both within the framework of the Data Collection, STECF and RFMOs (e.g. GFCM). This is especially relevant with respect to statistical procedures such as raising procedures and precision estimation for data quality.	
(c) Overall SGRN feels that the MS has only partly complied with the guidelines regarding the description of the collection of economic variables. Information needs to be provided concerning the collection of variables, methods used for estimation, consistency issues, sampling selection scheme etc.	

SECTION - MODULE	MAJOR SGRN COMMENT	
I General Framework	SGRN considers that MS has followed the guidelines	
II Organisation of NP	SGRN considers that MS has followed the guidelines however Ms should complete the table III_B_1 with info on RFMO (e.g GFCM) who is planning the meeting. For example GFCM is not organising the medits meeting and the box should be left blank. The bilateral coordination meeting between ROU and BUL is not an rcm as indicated in table II_B_1. SGRN was informed that this meeting is not eligible under DCF and it should be deleted from the table	
III Module on the Evaluation of the Fishing Sector		
III.A General Description of the Fishing Sector	Yes	
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines	
III.B.1 Data Acquisition	MS is asked to clarify the methods to calculate capital value, value of quota and fishing rights, FTE national, fuel efficiency of fish capture and imputed value of unpaid labour. MS is asked to include inactive vessels. MS is asked to provide further information on how the consistency of data coming from different data sources will be ensured. MS is asked to clarify the method used to select sample units.	
III.B.2 Estimation	MS is asked to describe the estimation method used for vessels less than 12m	
III.B.3 Data Quality Evaluation	MS is asked to provide further information on estimation methods and how quality is assessed in case of variables collected through sampling.	
III.B.4 Data Presentation	MS is asked to provide further information on when final data will be available.	
III.B.5 Regional Co-ordination	Not applicable	
III.B.6 Derogations and Non Conformities	Not applicable	

III.C Biological – Metier Related Variables		
III.C.1 Data Acquisition	 SGRN considers that MS has followed the guidelines Partly It is unclear is some of metiers (e.g. small scale fisheries) are merged prior to the ranking. Some fisheries are described within the text but do not appear in the table (e.g. beach seine). MS need to clarify. MS need to respect naming conventions at level 6 agreed on regional level all. MS need to perform pilot or present a reference showing that discards are negligible before excluding metiers (LHM, LLS) from discard sampling. The sampling frame code is the same for all metiers despite very different types of fisheries. MS need to clarify if all 	
	metiers really are sampled with one frame. Sampling strategy should be consistent with III_C_3. MS to update.	
	MS to list all G1 and G2 species, including sharks and large pelagics see also general comment. Table need to be updated.	
	MS describe what they are planning to do but all metiers are not sampled, there are inconsistencies in the tables. MS need to clarify.	
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines Partly MS need to describe how data is processed including raising procedures	
III.C.3 Data Quality evaluation III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines Partly MS asked to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update	
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines	
III.C.6 Derogation and Non Conformities	MS need to perform pilot or present a reference showing that discards are negligible before excluding metiers (LHM, LLS) from discard sampling.	
III.D Biological – Recreational Fisheries		
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines Eel and tuna is not present in MS water	
III.D.2 Estimation Procedures	NA	
III.D.3 Data Quality Evaluation	NA	
III.D.4 Data Presentation	NA	

	NA	
III.D.5 Regional Co-ordination		
III.D.6 Derogations and Non Conformities	NA	
III.E Biological – Stock Related Variables		
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines Partly Frame population is not described. MS need to update text. All sharks are not included in table III_E_1 neither are large pelagic fish. In the Black Sea only 2 EU MS are present. The share of EU landings between the two countries should add to 100%. This is not the case. MS to clarify and update the table In table IIE3 the planned minimum number set at regional level must correspond between the black sea countries, for example the number of samples agreed at regional level for Psetta maxima do not correspond between countries. MS to update table	
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines Mostly Estimation procedures should be described for raising sampled data to landings and the estimation of precision levels	
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines Mostly MS need to better to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update	
III.E.4 Regional Co-ordination	SGRN considers that MS has <i>not</i> followed the guidelines MS to include list of relevant RCM recommendations	
III.E.5 Derogations and Non Conformities	Rumania do not need to ask for a derogation to sample Trachurus trachurus since the landings are below 200 tonnes (exemption rules)	
III.F Transversal Variables	SGRN feels that the MS has mostly complied with the guidelines	
III.F.1 Capacity	MS is asked to provide information on when the final data will be available. MS is asked to check table III.F.1 and correct variability indicators and data collection scheme.	
III.F.2 Effort	MS is asked to provide information on when the final data will be available. MS is asked to check table III.F.1 and correct variability indicators and data collection scheme.	
III.F.3 Landings	MS is asked to provide information on when the final data will be available. MS is asked to check table III.F.1 and correct variability indicators and data collection scheme.	

III.G Research Surveys at Sea		
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines however MS should not refer to a bilateral meeting as a regional coordination meeting	
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines	
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines	
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines	
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry		
IV.A Collection of data Concerning Aquaculture	SGRN feels that the MS has mostly complied with the guidelines	
IV.A.1 General Description of the Aquaculture Sector		
IV.A.2 Data Acquisition	Definition and methodology for capital costs should be provided. In case table 5 refers to the questionnaire, it does not follow the disaggregation laid down in regulation. Data should be gathered at the variable level; not variable group level. Should be revised by MS.	
IV.A.3 Estimation	MS should provide estimation method according to the guidelines given. Table IV.A.3 only bias indicator is mentioned. For probability based sampling also variation measure should be provided and the methodologies provided are not clear. Should be clarified by MS.	
IV.A.5 Presentation	The timeline for data presentations should be provided by MS.	
IV.A.6 Regional Co-ordination	Not applicable	
IV.A.7 derogation and Non Conformities	Not applicable	

IV.B collection of data Concerning the Processing Industry	SGRN feels that the MS has mostly complied with the guidelines	
IV.B.1 Data Acquisition	Clear definition and information of the source of target population should be provided. Not clear if secondary activity firms will be studied. The questionnaire does not follow the level of disaggregation laid down in regulation. Data should be gathered at the variable level; not variable group level. Should be revised by MS. If panel data approach, the rotation should be considered.	
IV.B.2 Estimation	MS should provide estimation method according to the guidelines given.	
IV.B.3 Data Quality Evaluation	No description of methodological procedures have been provided. MS should provide estimation method according to the guidelines given.	
IV.B.4 Data Presentation	The timeline for data presentations should be provided by MS.	
IV.B.5 Regional Co-ordination	No Comments	
IV.B.6 Derogation and Non Conformioties	No Comments	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines Mostly MS should explain why the ecosystem indicator 6 is not reported in able VI MS to justify how they calculate indicator 8 based on survey data	
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines however Statements on cost should be in a separate document.	
VII Follow up of STECF Recommendations	SGRN considers that MS has <i>not</i> followed the guidelines MS to include list of STECF recommendations and national actions	
VIII List of Derogations	SGRN considers that MS has <i>not</i> followed the guidelines MS to include list of derogations sought	
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines	

X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines	
XI References	SGRN considers that MS has followed the guidelines	
XII Annexes	SGRN considers that MS has followed the guidelines	

1.19 MEMBER STATE : SLOVENIA PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Partly
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	100
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Partly
marine region and did the MS make every effort to co-ordinate	1 artiy
their actions with third countries having sovereignty or	
jurisdiction over	
•	
Waters in the same marine regions. 7 Did MS take into account the recommendations made by	Partly
•	Partiy
RCM's	
From SGRN 09-03 Guidelines	Maath
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Partly
MS ?	
10 Overall Comments by SGRN on NP	
(a) The Slovenian national proposal for the collection of fisheries is in general in accordance with EC 199/08 and Commission Decision 93/2010. SGRN appreciates the improvement that was done by member state since the implementation on the NP.	
(b) MS is encouraged to be involved more in international co- ordination and scientific meetings. Most of the problems encountered in the NP are due to a lack of participation in meetings and the relevant scientific discussions and agreements which are taken at international level both within the framework of the Data Collection, STECF and RFMOs (e.g. GFCM). This is especially relevant with respect to statistical procedures such as raising procedures and precision estimation for data quality.	
 (c) Overall SGRN feels that the MS has only partly complied with the guidelines regarding the description of the collection of economic fleet variables, further information needs to be provided concerning how to deal with data inconsistencies and data evaluation methodologies. Furthermore, the MS needs to check the standard tables for economic variables. (d) Overall SGRN feels that the MS has mostly complied with the guidelines regarding the description of the collection of data on the aquaculture and processing sectors. 	

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	
II Organisation of NP	SGRN considers that MS has followed the guidelines however Slovenia should make efforts to coordinate sampling with Italy both for metier and biological related variables including estimation of precision
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	Yes
III.B Economic Variables	SGRN feels that the MS has partly complied with the guidelines.
III.B.1 Data Acquisition	Tables should refer to the 2010, 2011 and 2012. MS reported information for 2008, and this is wrong. MS should defined fleet segments using current DCF recommendations and not using segment codes. MS did non reported clustered segments but each segment within a cluster.
	MS is required to specify how they check consistency of data coming from different data sources
III.B.2 Estimation	No special comments.
III.B.3 Data Quality Evaluation	MS is required to add formulas to describe how they evaluate the quality of their estimates.
III.B.4 Data Presentation	MS is asked to provide information on reference years. MS is required to specify the list of segments for which problems of confidentiality might arise.
III.B.5 Regional Co-ordination	MS is asked to check the list of RCM recommendations and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities	No special comments.
III.C Biological – Metier Related Variables	
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly There are some inconsistencies in codification in table III_C_1, MS should respect naming conventions and clarify

	"other_0_0_0" Sampling strategy should be consistent with III_C_4. MS to update
	Sampling strategy should be consistent with III_C_3. Year 2013 is missing in the table. MS to clarify and update MS to list all G1 and G2 species (appendix VII 93/2010), including sharks and large pelagics see also general comment. Table need to be updated The frame population is not described by the MS. MS should clarify if small vessels are coverd by the program. MS to update text
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines Partly: MS need to describe how data is processed including raising procedures.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines Partly: MS asked to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update
III.C.4 Data Presentation	No Comments
III.C.5 Regional Co-ordination	Slovenia should make efforts to coordinate sampling with Italy for metier (and stock related variables) including estimation of precision
III.C.6 Derogation and Non Conformities	No Comments
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines Partly: MS have to describe recreational fisheries only for bluefin tuna and eel. MS need to clarify if there are a recreational fishery for tuna and if this fishery is sampled. Eel is protected from fishing by Slovakian law but at the same time it seems like by-catch occur from the text. MS need to clarify.
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines No relevant RCM recommendations exist
III.D.6 Derogations and Non Conformities	Derogation from sampling eel in recreational fishery is considered acceptable by SGRN if the MS clarify the situation of eel by-catches and if these by-catches are low / non-existent .

III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines Mostly: All species, including sharks, listed in appendix VII should be included in the table. See general comment. MS should update table.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines Partly: Estimation procedures should be described for raising sampled data to landings and the estimation of precision levels. MS to update
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines Partly: MS need to clarify methods to be used for calculating precision and quality check procedures. References should be included in the NP. MS to update
III.E.4 Regional Co-ordination	SGRN considers that MS has <i>not</i> followed the guidelines MS to include list of relevant RCM recommendations
III.E.5 Derogations and Non Conformities	Slovenia do not need to ask for a derogation to sample eel since the landings are below 200 tonnes
III.F Transversal Variables	SGRN feels that the MS has partly complied with the guidelines.
III.F.1 Capacity	MS has to provide table III.F.2.
III.F.2 Effort	MS is asked to provide detailed information on reference years as requested by DCF. MS is asked to check if there are initiatives taken to coordinate the sampling program with countries of the same marine region and if it is the case to provide further information.
III.F.3 Landings	MS provides info on assessment of data quality only for vessels over 10m and it is thus required to add info for vessels below 10m.
	MS is asked to check if there are initiatives taken to coordinate the sampling program with countries of the same marine region and if it is the case to provide further information.
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN considers that MS has followed the guidelines Partly: No correlation between ecosystem indicator in Table III_G_1 and in the text page 27. MS need to clarify if they collect data for ecosystem indicator 4. MS need to perform the survey preferably in the second quarter following the

	Medits manual and in any case not later than September following 93/2010 appendix IX and not in October as reported in table III_G_1. Table should be updated
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines MEDIAS stored in Italian database
III.G.5 Derogation and Non Conformities	Non-conformity: See comment on timing of the survey
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	SGRN feel that MS has mostly complied with the guidelines.
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	MS is asked to add information for all reference years in table IV.A.2 and IV.A.3. Figures on volume and value in the description are asked for.
IV.A.2 Data Acquisition	The text mentions 18 enterprises, the table shows less. MS is asked to clarify. MS is asked for further description how the consistency of data coming from different sources will be ensured.
IV.A.3 Estimation	MS is asked for more methodological details how they raise final estimates. Additionally details of estimating FTE are asked for. The method to calculate unpaid labor is not adequate.
IV.A.4 Data Quality	No comments
IV.A.5 Presentation	MS is asked to address confidentiality problems.
IV.A.6 Regional Co-ordination	No Comments
IV.A.7 derogation and Non Conformities	No Comments
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has mostly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked to list all reference years in the tables. Also the reference year in table IV.B.2 differs from table IV.B.1. MS

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IV.B.2 Estimation	to clarify. MS shall collect data for variables mentioned in 199/2008 for the fish processing sector, not for the fleet. MS shall rewrite explanatory notes with regard to fish processing. In the case of unpaid labor MS shall consider the case of family members as well. MS is asked for further description how the consistency of data coming from different sources will be ensured. Details especially for estimating FTE are asked for. The method to calculate unpaid labor is not adequate. MS should be aware about having a small sector with maybe large differences between the companies and the
IV B 3 Data Quality Evaluation	More details are needed for the case that quality issues
IV.B.3 Data Quality Evaluation	eventually arise.
IV.B.4 Data Presentation	No comments
IV.B.5 Regional Co-ordination	No comments
IV.B.6 Derogation and Non Conformities	MS will not collect data by gender. This is mandatory. MS shall follow DCF regulation and if not, justify it in this section of the NP. To be clarified. For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines Mostly: MS need to clarify if they collect data for ecosystem indicator 4.
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines Partly: No follow up regarding STECF recommendations on biological data. MS to update table
VIII List of Derogations	SGRN considers that MS has followed the guidelines

IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines however Some of the annexes are not in English which make them difficult to understand for the evaluation group.

1.20 MEMBER STATE : SPAIN PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	No
Programme ?	
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	Vaa
4 Did the NP include a scheme of research surveys at sea?5 Did the NP include a scheme for the management and use of	Yes Yes
the data for scientific analyses purposes?	165
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Mostly
marine region and did the MS make every effort to co-ordinate	moony
their actions with third countries having sovereignty or	
jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Mostly
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	No
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	No
10 Overall Comments by SGRN on NP	
(a) SGRN based its evaluation on the English version provided by DG-MARE. Given the complexity of the MS NP, it was clear when doing the evaluation. However, the indexes were missing in this version.	
(b) The total value of the landings, needed for the ranking of the metier (section C) is missing for all regions. Regional coordination seems to be well followed, except for the Mediterranean and Black Sea.	
(c) More consideration should be given to monitoring of the recreational fisheries.	
(d) SGRN feels that the MS has not complied with the guidelines and the DCF regarding the collection of economic data. In the sections where information has been provided this was not sufficient to evaluate.	
(e) SGRN notes that the MS asks for derogations regarding the collection of economic data. Nonetheless, the justifications cannot be accepted.	
(f) SGRN recommends the MS to provide the standard tables in English.	

MAJOR SGRN COMMENT
Ok
No mention is made on who is responsible for the economic and transversal variables, processing industry and aquaculture. To be completed by MS.
MS requires authorisation to send more than 2 experts to meetings sometimes due to the complexity of the fisheries. SGRN agrees with MS demand. Financial issues to be dealt with directly with the Commission
The fishing sector is extensively described (20 pages in annex), but MS should be more concise when drafting the next NP proposal .
SGRN feels that MS has not complied with the guidelines
MS is asked to provide more information on most sections. MS is strongly recommended to provide tables in English.
MS is asked to provide more information on estimation methods.
MS is asked to provide this information
MS is asked to provide this information
Not applicable since MS has provided no information
MS has provided derogations but justifications are not acceptable.

REGION NORTH ATLANTIC

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	REGION NORTH ATLANTIC
III.C.1 Data Acquisition	[SGRN considers this section as partly following the guidelines]
	In Table III.C.1, the total value in euros is not given. Table to be resubmitted by MS.
	2004-2006 was used as a basis for ranking whereas 2006-

SECTION - MODULE	MAJOR SGRN COMMENT
	2008 was recommended by the guidelines. MS is invited to redo a ranking system with more recent periods in order to evaluate if changes need to be made to the sampling programmes.
	Figures in Table III.C.5 should be specified by fishing grounds, and correspond to more species than the list given if concurrent sampling is done.
	A pilot project for rays together with Portugal was recommended by previous RCM NA and LM (2009), so SGRN agrees with the pilot project demanded by MS.
	A pilot project for eel is also demanded for fine-tuning the national sampling programme, SGRN agrees with the pilot project demanded by MS.
	The coding in table III.C is respected but the allocation of trips to metier method is a statistical complex method which results in a lot of mixed target assemblages. The RCM NA (2008) recommended a way of doing in waiting for the outcome of the call for tender which is simple and avoid the use of mixed target assemblage. As a result, Spain metier often do not compare to other MS metiers. Moreover, RCM NA 2010 recommended Spain and Portugal to define their metiers in a common way. The call for tender will deliver its final report soon, and all the coding should be reassessed at the light of this expert group recommendations.
	MS should avoid the use of text tables in the text document. The set of Excel tables contain all the required elements.
	A brief description of the metiers selected by the ranking system should be provided.
	Scientific justification for merging some metiers are not given.
	MS should clarify whether the small scale vessels are part of their sampling programme.
	A number of recommendations were made in the recent RCMs concerning the allocation of samples to metier. Like other MS, Spain never had the time to react to these recommendations and modify their proposals. SGRN recommends MS to consider all RCM recommendations and modify their NP proposal accordingly before the start of the implementation year.
	The sampling programme is not planned to reach a given precision objective. It is explained that updated fishing logs and sales notes are not available to scientists to fine tune the sampling intensity. This is unfortunate, and SGRN recommends Spain to make every effort to provide scientists with updated information for optimising their sampling.
III.C.2 Estimation Procedure	[SGRN considers that this section has followed the guidelines]
	Mixed species and discards are mentioned, but only the

SECTION - MODULE	MAJOR SGRN COMMENT
	start of the estimation procedures is given, nothing about
	the raising procedure.
	See general comment
	In general, SGRN appreciates when MS makes reference to publication, detailed methodologies available on national websites or give a concise description. The use of the COST tools is seen as a positive statement ensuring the use of agreed estimation procedures. [SGRN considers this section as following the guidelines]
III.C.3 Data Quality evaluation	
	SGRN appreciates the reference to WKACCU and the description of methods for evaluation of the quality of discards estimates. Are missing quality evaluation for length structures of the landings.
	In general, information is given but SGRN appreciates when MS makes reference to publication (), WKACCU (Spain, UK), detailed methodologies available on national websites (France) or give a concise description (UK). The use of the COST tools (UK) is seen as a positive statement ensuring the use of agreed methods for estimating the quality of the estimation (qualitative and quantitative).
	Usually, nothing is said on registering the refusals for on- board observers, although this point was raised in the 2003 workshop in Charlottenlund and is important to assess the quality of the estimates.
III.C.4 Data Presentation	Ok
III.C.5 Regional Co-ordination	SGRN appreciates the Very detailed descriptions given on all regional co-operation across surveys, landings and discards.
III.C.6 Derogation and Non Conformities	All skates landed are processed (skinned and winged) and are not available for sampling. This derogation was requested in 2007 and was accepted by the SGRN 06-04 "Analysis of derogations and non-conformities of Member States' data collection National Programme Proposals for 2007" held in November 2006. This derogation has been requested again every year since then. SGRN recommends MS to include this issue in their pilot project on rays together with Portugal.
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	Only eel in the Basque country is mentioned. Nothing is said about eel elsewhere and salmon, sea bass and sharks. Information to be provided by MS.
III.D.2 Estimation Procedures	Not Ok except for eel in the Basque country.
III.D.3 Data Quality Evaluation	Not Ok except for eel in the Basque country.

SECTION - MODULE	MAJOR SGRN COMMENT
III.D.4 Data Presentation	No mention when the data will be available. MS to give precisions.
III.D.5 Regional Co-ordination	There is no recommendation related specifically to Spain
III.D.6 Derogations and Non Conformities	No mention in the text on monitoring recreational for salmon, sea bass, sharks and eel other than in the Basque country. Non conformity.
III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	There are few species which are not planned to be sampled although landings are above 200 t and the share in EU landings is greater than 10%. SGRN considers that the following list of species should be sampled. North Atlantic Lepidopus caudatus IXa Mullus surmuletus All areas Octopus vulgaris VIIIc, IXa Zeus faber All areas Sebastes spp. 3O Sebastes mentella. SA1 Highly migratory Species Atlantic, Indian and Pacific Oceans Istiophoridae The following species has landing of greater than 200 t (Thunnus alalunga) and agreement to sample this with other countries should be discussed at the RCM LDF
III.E.2 Estimation Procedures	MS will use the COST tool, but no sampling protocol is given. To be prepared by MS for future NP proposals.
III.E.3 Data Quality Evaluation	MS states that they will use COST, and reference to relevant workshops is made. MS ensures data will be provided on-time to assessment working groups.
III.E.4 Regional Co-ordination	MS participates to RCM and follows up all recommendations on stock variables.
III.E.5 Derogations and Non Conformities	 Derogations demanded for Whiting (Merlangius merlangus) in sub-areas VIII, IX and X, since TAC > 200t and share >10% but actual landings about 5 tonnes. Acceptable Blue whiting (Micromesistius poutassou): in Divisions VIIIc and Ixa for maturity, since MS does not have access to the area where fish migrate during the spawning season : Acceptable. All skates that are landed are processed (winged and skinned) and cannot serve for sampling. See comment in Region North Atlantic. Listed as non-conformities are:

SECTION - MODULE	MAJOR SGRN COMMENT
	 Horse mackerel (Trachurus trachurus) in VIIIc- Ixa / IIa, IVa, Vb, VIa, VIIa-c,e-k, VIIIabde/X
	 Hake (Merluccius merluccius): reduction of number of otoliths to collect following recommendation by relevant expert group : Acceptable.

Region Mediterranean and Black Sea

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	Region Mediterranean and Black Sea
III.C.1 Data Acquisition	In Table III.C.1, the total value in euros is not given. SGRN recommends MS to make this information available for the 2011 RCMs.
	MS must use the naming convention agreed at regional level during the RCM Med & BS for large pelagics. MS should resubmit a new set of tables for the use of the 2011 RCMs.
	SGRN find it unacceptable that MS does not sample trawlers targeting small pelagics (PS_SPF_>=0_0). MS should complete the table for this metier.
	MS have not listed all G1 and G2 species (including sharks) in Table III.C.5. Species of App. VII should be listed even if the catches are low or not present. SGRN note that Spanish sampling levels for large pelagics (except BFT) widely exceed what is agreed in the RCM Med & BS. SGRN recommends MS to follow strictly the regional approach.
III.C.2 Estimation Procedure	Ok
III.C.3 Data Quality evaluation	Ok
III.C.4 Data Presentation	
III.C.5 Regional Co-ordination	Spain states that in terms of sampling levels (length measurements) they will only follow the RCM recommendation on BFT. Spain should follow the agreed recommendations for all species.
III.C.6 Derogation and Non Conformities	Ok

SECTION - MODULE	MAJOR SGRN COMMENT
III.D Biological – Recreational Fisheries	Region Mediterranean and Black Sea
III.D.1 Data Acquisition	Recreational fisheries for eel is not included in the Mediterranean part of the NP. MS should explain why and if relevant include recreational fisheries on eel in their sampling programme. For Blue fin tuna, SGRN agrees with MS approach.
III.D.2 Estimation Procedures	Ok, except for eel.
III.D.3 Data Quality Evaluation	Ok, except for eel. MS should include analysis of potential bias.
III.D.4 Data Presentation	Ok, except for eel.
III.D.5 Regional Co-ordination	NA
III.D.6 Derogations and Non Conformities	No derogation demanded.
III.E Biological – Stock Related Variables	Region Mediterranean and Black Sea
III.E.1 Data Aquisition	All sharks are not included in table III.E.1. In all tables III.E, MS have added species not present in appendix VII (i.e Auxis rochei, Euthynnus alleteratus) Areas should be reported by GSA as agreed by the RCM Med&BS and following Comm. Dec. 2010/93/EU. Sharing of TAC for BFT should be reported. MS must follow the agreed regional recommendations. The reported landing on eel in the table is 0. However in ICES WKEEL report 2006 it is stated that there are an inportant glasseel fishery in the area. MS to clarify and update the table . According to the RCM Med&BS recommendation MS should sample stock related variables for large pelagic species only in 2013. Sampling should further be done by metier. The numbers to be sampled in 2013 should also follow the recommendation of the RCM. MS must follow the agreed regional recommendations. MS should check required precision levels for crustaceans. There are few species which are not planned to be sampled although landings are above 200 t and the share in EU landings is greater than 10% SGRN considers that the following list of species should be sampled. Mediteranean and Black Sea Loligo vulgaris All areas
	Pagellus erythrinus All areas

SECTION - MODULE	MAJOR SGRN COMMENT
	Sparus aurata 1.2, 3.1
III.E.2 Estimation Procedures	Ok
III.E.3 Data Quality Evaluation	Ok
III.E.4 Regional Co-ordination	SGRN do not accept the statement that MS followed the RCM Med&BS recommendation on sampling coordination for large pelagics. To be clarified by MS. SGRN considers also that RCM recommendations are not contradictory to ICCAT requirements.
III.E.5 Derogations and Non Conformities	MS demands a derogation to sample only Lophius budegassa since Lophius piscatorius are far less abundant in the landings and small samples would hardly be representative of the population. Acceptable. A non conformity is listed for sampling 3 species having less than 10% of the European share. SGRN recalls that the exemption rules in the Comm. Dec. are only an optional tool to use, and that MS has only to include these sampling in the tables III.E.

CECAF

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	CECAF
III.C.1 Data Acquisition	In Table III.C.1, the total value in euros is not given. SGRN recommends MS to make this information available for the 2011 RCMs.
III.C.2 Estimation Procedure	ОК
III.C.3 Data Quality evaluation	Sampling coverage is used as data quality descriptor. Potential bias is identified in the case of fisheries which depend on agreements with third countries, and which land part of their catches in these third countries (PS_SPF_0_0_0 anchovy seiner, OTB_CEP_>=70_0_0 targeting cephalopods, OTB_CRU_>=40_0_0 targeting shellfish and OTB_DEF_>=70_0_0 targeting hake) No reference has been made to ICES methodological workshops (WKACCU, WKPRECISE, WKMERGE).
III.C.4 Data Presentation	Data ready for the Commission calls for data and for the CECAF working meetings on demersal and small pelagic species
III.C.5 Regional Co-ordination	Although no agreement has been signed, landings by the Community's small pelagic trawl fleet (OTM_SPF_>=40_0_0) are sampled

SECTION - MODULE	MAJOR SGRN COMMENT
	At the RCM LDF 2010 communication was established between Spain and EU countries with industrial trawler fleet targeting small pelagic species and landing in Spanish ports(OTM_SPF_>=40_0_0). This RCM will allow for a better regional coordination in this area in the future
III.C.6 Derogation and Non Conformities	No derogations requested, Non conformities are related to difficulties in getting access to some vessels,
III.E Biological – Stock Related Variables	
III.E.1 Data Acquisition	
III.E.2 Estimation Procedures	A description of the models used to estimate biological parameters is given
III.E.3 Data Quality Evaluation	No Comments
III.E.4 Regional Co-ordination	Biological and fishery data are gathered exclusively for the Spanish fleet.Up to the present there has been no regional coordination in this zone.
	At the RCM LDF 2010 communication was established between Spain and EU countries with industrial trawler fleet targeting small pelagic species and landing in Spanish ports(OTM_SPF_>=40_0_0). This RCM will allow for a better regional coordination in this area in the future
III.E.5 Derogations and Non Conformities	There are no derogation requests in this section.

Other Regions

ICATT

SECTION - MODULE	MAJOR SGRN COMMENT
III.C Biological – Metier Related Variables	ICATT
III.C.1 Data Acquisition	SGRN considers that MS has mostly followed the guidelines.
	In Table III.C.1, the total value in euros is not given. SGRN recommends MS to make this information available for the 2011 RCMs.
III.C.2 Estimation Procedure	

SECTION - MODULE	MAJOR SGRN COMMENT
SECTION - MODULE	SGRN considers that MS has followed the guidelines.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines.
III.C.5 Regional Co-ordination	
	SGRN considers that MS has followed the guidelines.
III.C.6 Derogation and Non	SGRN considers that MS has followed the guidelines.
Conformities	SORT considers that ino has followed the guidelines.
III.E Biological – Stock Related Variables	
Valiables	
III.E.1 Data Acquisition	MS should clarify for which biological stock related variables a derogation is requested. This is not clear in the text of the
	NP. SGRN recall that maturity for large pelagics should be
	collected according to appendix VII of EC 93/2010. Highly migratory Species Atlantic, Indian and Pacific
	Oceans
	Istiophoridae The following species has landing of greater than 200 t
	(Thunnus alalunga) and agreement to sample this with
	other countries should be discussed at the RCM LDF
III.E.2 Estimation Procedures	
	SGRN considers that MS has followed the guidelines.
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines.
III.E.4 Regional Co-ordination	CODN considers that MC has followed the switchings
	SGRN considers that MS has followed the guidelines.
	SGRN are not in position to evaluate if the justifications for
III.E.5 Derogations and Non	derogations on sampling large pelagics within the DCF
Conformities	within certain areas are acceptable. MS advised to address

SECTION - MODULE	MAJOR SGRN COMMENT
	the issue within the RCM LDF. Sampling arrangement within RFMOs and the implications on derogations within DCF is suggested to be a ToR for the next RCM. MS is invited to follow the regional recommendations.

ALL REGIONS

SECTION - MODULE	MAJOR SGRN COMMENT
III.F Transversal Variables	SGRN feels that MS has not complied with the guidelines
III.F.1 Capacity	MS is asked to clarify this information
III.F.2 Effort	MS is asked to provide this information
III.F.3 Landings	MS is asked to clarify this information
III.G Research Surveys at Sea	
III.G.1 Planned Surveys	SGRN confirms that all surveys are in the current list of eligible surveys in App. of Comm. Dec. 2010/93/EU. (Except for JUVENA and REDNOR survey included in NP, (not in Tables), not in approved list of surveys) MEDIAS : areas should be reported by GSA as agreed by the RCM Med&BS and following Comm.Dec. 2010/93/EU. MS to clarify why timing is different between fish hauls and acoustic tracks in the Medias survey. MEDITS : areas should be reported by GSA as agreed by the RCM Med&BS and following Comm.Dec. 2010/93/EU. MEDITS : areas should be reported by GSA as agreed by the RCM Med&BS and following Comm.Dec. 2010/93/EU. Maps are not presented in the English version of the NP Extension of DEPM (SAREVA) by 3 days recommendation from WGACEGG SGRN endorses this extension as the
III.G.2 Modification in the Surveys	combined survey days do not exceed the maximum stated by the regulation Ok
III.G.3 Data Presentation	Ok
III.G.4 Regional Co-ordination	MEDIAS : Data stored in IEO

SECTION - MODULE	MAJOR SGRN COMMENT
III.G.5 Derogation and Non Conformities	Ok none demanded
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feels that MS has not complied with the guidelines
IV.A.1 General Description of the Aquaculture Sector	Tables is filled in Spanish, it could therefore not be evaluated.
IV.A.2 Data Acquisition	MS has to follow DCF regulation. It remains unclear if all variables are collected according this regulation. Variables have to be provided in table IV.A.2, not in IV.B. 2. MS to clarify. MS is asked for further description how the consistency of data coming from different data sources will be ensured. MS is asked for further detailed description on the sampling protocol, including the allocation of enterprises within segments, and the concordance of the segments with the Regulation.
IV.A.3 Estimation	MS is asked for more methodological details. Additionally details of estimating FTE are asked for.
IV.A.4 Data Quality Evaluation	MS is asked for further detailed description on the method used for assessing the acceptable quality of the data. Especially the reference to the processing sector table is wrong, as it is concerning aquaculture. MS is asked for further detailed description on methods to assess the variability of the estimates and bias.
IV.A.5 Presentation	MS is asked to address when the final data will be available, provide the reference year and address any confidentiality problems
IV.A.6 Regional Co-ordination	Not applicable
IV.A.7 derogation and Non Conformities	MS and Commission are asked to solve the problems raised, as Spain seems to be the only country not able to follow the provisions in the new DCF.
IV.B collection of data Concerning the Processing Industry	SGRN feels that MS has not complied with the guidelines

SECTION - MODULE	MAJOR SGRN COMMENT
IV.B.1 Data Acquisition	MS and Commission are asked to solve the problems that Spain as the only country does not submit data following the provisions in the new DCF. Spain asks the Commission to get the data from the webpage from NSI. For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing
IV.B.2 Estimation	Not applicable
IV.B.3 Data Quality Evaluation	Not applicable
IV.B.4 Data Presentation	Not applicable
IV.B.5 Regional Co-ordination	Not applicable
IV.B.6 Derogation and Non Conformities	MS and Commission are asked to solve the problems raised, as Spain seems to be the only country not able to follow the provisions in the new DCF.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines. However only limited information is given in text
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines. Data quality is described in other sections of the program
VII Follow up of STECF Recommendations	SGRN considers that MS has followed the guidelines.
VIII List of Derogations	SGRN considers that MS has followed the guidelines.
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines.
X Comments, Suggestions	Issues raised to be addressed by SGRN when reflecting on a revision of the Comm. Dec. 2010/93/EU.

SECTION - MODULE	MAJOR SGRN COMMENT
and Reflections	
XI References	SGRN considers that MS has followed the guidelines.
XII Annexes	No annexes in English Version

1.21 MEMBER STATE : SWEDEN PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community Programme ?	Yes
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same marine region and did the MS make every effort to co-ordinate their actions with third countries having sovereignty or jurisdiction over Waters in the same marine regions.	Yes
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the MS ?	Yes
10 Overall Comments by SGRN on NP	
 (a) SGRN recognizes the MS for its effort in compiling the NP in good accordance with the Guidelines. The specific comments and observations of SGRN are given below. (b) SGRN feels that the MS has done a good job and mostly complied with the guidelines regarding the description of the collection of economic fleet variables, but information on 	
clustering needs to be provided. (c) No remarks on aquaculture and fish processing sectors.	
(d)	

PART 2 – SPECIFIC COMMENTS BY SGRN ON NP

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has not followed the guidelines. In this section there is no information about general framework in relation with DCF, only years of implementation are mentioned. MS should follow the guidelines and provide information about the general framework.
II Organisation of NP	SGRN considers that MS has followed the guidelines.
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	Yes
III.B Economic Variables	SGRN feels that the MS done a good job and managed to complied with the guidelines
III.B.1 Data Acquisition	MS is asked to provide information about targets used to determine the sample size and changes in sample size over the time.
III.B.2 Estimation	No comments
III.B.3 Data Quality Evaluation	No comments
III.B.4 Data Presentation	No comment
III.B.5 Regional Co-ordination	MS is asked to check this and if it is the case to provide further information.
III.B.6 Derogations and Non Conformities	No comments
III.C Biological – Metier Related Variables	BALTIC SEA SGRN considers that MS has followed the guidelines mostly
III.C.1 Data Acquisition	SGRN considers that MS has followed the guidelines mostly
	In table III_C 3 appears a metier OTB_SPF_16-31_0_0, which does not match with previous tables III_C_2 and III_C_1 where appear as OTB_SPF_16-104_0_0. SGRN asks MS to check the consistency of the tables.
	SGRN ask MS to explain the meaning of NA in column P in table III_C_3 and columns O and P in table III_C_4. In those columns, a number or an asterisk with an explanation

	should appear.
	Following the texts of NP it is not clear if small scale fisheries are included in the frame although some references to of small scale fisheries are done under different headings. To be clarified by MS.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines partly. Only the words "analytical methods" are mentioned but any description of methods that will be used for estimating the discards volumes and the length and age structure of the catches are in NP. More information to be provided by MS.
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines mostly. In NP only quality checks in national database are mentioned. No information about indications of precision, raising procedures or procedures developed for validation and quality checks. SGRN asks MS to provided more information on this issues.
III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	 Sweden has requested derogations for sampling 6 metiers in Baltic Sea The justification is "proved low discarding" the fact that the métiers has picked up only by the effort ranking sampling is not considered cost-effective According to DCF, all metiers selected by the ranking system should be sampled for landings and discard. There are provisions in DCF to reduce the sampling burden (e.g. merging; international co-operation). SGRN would point out that derogations can be granted if reaching for target precision level implies excessive costs or if they are fully documented and scientifically proven. No such documentation has been provided by MSs. SGRN consider that derogations can only be granted if the level of discard is statistically proven and supported by documentation. However derogation for sampling FPO_FWS_0_0_0 SD 30-31 is based the low landings (17 tons in 2007-2008), geographically restricted to a small area and the low variability (only catch one species). This métier is not picked up by RCM ranking. SGRN considers that this derogation is justified.
III.D Biological – Recreational Fisheries	BALTIC SGRN considers that MS has followed the guidelines
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines

III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines partly MS has not provided any source of possible bias in this section. Information to be provided by MS.
III.D.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.D.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.D.6 Derogations and Non Conformities	SGRN considers that MS has followed the guidelines
III.E Biological – Stock Related Variables	BALTIC SEA
	SGRN considers that MS has followed the guidelines mostly
III.E.1 Data Acquisition	SGRN considers that MS has followed the guidelines mostly
	Table III_E_3: In Column N should appear a number of individuals to be sampled at regional level when there is a regional coordinated sampling. MS stated a sampling coordinated with DEN but in Danish table III_E_3 this regional coordinated sampling does not appear.
	MS states that targets and frames are still in process of definition." Sweden plan to use the outcome from the workshops (WKACCU, WKPRECISE and WKMERGE.) as a guidance to set the target and sampling frame" .SGRN asks MS to provide this information for the revision of 2012 NP when the targets and frames are expected to be already implemented.
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.E.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines partly No reference to any source of bias is presented in this section. To be updated by MS.
III.E.4 Data presentation	SGRN considers that MS has followed the guidelines Missing information about data presentation. Due to an error, this heading does not appear in guidelines, so is acceptable not to be this information here. SGRN assumes that MS provide the biological data collected to assessment
III.E.5 Regional Co-ordination	WG it attends. SGRN considers that MS has followed the guidelines
III.E.6 Derogations and Non	SGRN considers that MS has followed the guidelines MS has requested the derogation for not to sample cod sex

Conformities	and maturity and for salmon maturity, and for salmon monitoring in one index rivers. SGRN consider these derogations justified and well explained in NP.
III.F Transversal Variables	SGRN feels that the MS done a good job and managed to complied with the guidelines
III.F.1 Capacity	No comments
III.F.2 Effort	No comments
III.F.3 Landings	MS should clarify if vessels under 10 m are covered by data collection.
III.G Research Surveys at Sea	BALTIC SEA
III.G.1 Planned Surveys	SGRN confirms that all surveys are in the current list of eligible surveys
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has complied with the guidelines.
IV.A.1 General Description of the Aquaculture Sector	MS is asked to add information for all reference years in the tables.
IV.A.2 Data Aquisition	MS refers to Comm. Dec. 2010/93/EC concerning clustering, relevant is 2008/199. To be clarified by MS. MS is asked for further description how the consistency of data coming from different sources will be ensured.
IV.A.3 Estimation	Additionally details of estimating FTE are asked for.

IV.A.4 Data Quality	No Comments
IV.A.5 Presentation	MS is asked to clarify when final data will be available for each reference year.
IV.A.6 Regional Co-ordination	No Comments
IV.A.7 derogation and Non Conformities	No Comments
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has complied with the guidelines.
IV.B.1 Data Acquisition	MS mentions A and C as types of data collection in table IV.B.2. This is not reflected in table IV.B.1. MS to clarify. MS is asked for further description how the consistency of data coming from different sources will be ensured.
IV.B.2 Estimation	Details especially for estimating FTE are asked for. MS should be aware about having a small sector with maybe large differences between the companies and the possible bias of simple extrapolation.
IV.B.3 Data Quality Evaluation	More details are needed for the case if quality issues eventually arise.
IV.B.4 Data Presentation	No Comments
IV.B.5 Regional Co-ordination	No Comments
IV.B.6 Derogation and Non Conformioties	MS will maybe not collect data by gender. This is mandatory. MS shall follow DCF regulation and if not, justify it in this section of the NP. To be clarified. For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. MS to address this.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	SGRN considers that MS has followed the guidelines
VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines mostly. Data bases are very well described but it is not clear how the quality control and validation process of the primary and aggregated data are made. More information to be provided by MS.

VII Follow up of STECF Recommendations	SGRN considers that MS has not followed the guidelines The list of STECF Recommendations and responses is missing. MS states that "requests from the Commission for clarifications and explanations have been delivered in time and accepted" SGRN asks the MS to follow the Guidelines and provide the missing list.
VIII List of Derogations	SGRN considers that MS has followed the guidelines partly. The list presented by MS is uncompleted. Additionally the list of historical derogations is missing. SGRN asks MS to provide the missing information.
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	SGRN considers that MS has followed the guidelines
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	SGRN considers that MS has followed the guidelines

1.22 MEMBER STATE : UK PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the Community	Mostly
Programme ?	-
2 Did the NP include a multiannual sampling programme ?	Yes
3 Did the NP include a scheme for at sea monitoring of	Yes
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at sea?	Yes
5 Did the NP include a scheme for the management and use of	Yes
the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the same	Yes
marine region and did the MS make every effort to co-ordinate	
their actions with third countries having sovereignty or	
jurisdiction over waters in the same marine regions.	
7 Did MS take into account the recommendations made by	Yes
RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	Mostly
9 Did the NP allow SGRN to evaluate what is planned by the	Mostly
MS ?	
10 Overall Comments by SGRN on NP	
(a) The NP is clearly describing the data collection which is	
proposed to be carried out by the UK. Sufficient clarification and	
justification is given on the proposed sampling strategies and	
methods used for evaluating the quality of data. The regional	
structure is not always strictly followed in the report. A strict	
separation of the regions in the report is required according the	
guidelines. An uniform structure applied by all MS in the NP	
facilitates the evaluation of the report by SGRN, although this	
also may lead to unnecessary repetition of text. A clear table of	
contents with page numbers would facilitate the evaluation of	
the report but is missing.	
(b) Catches in the CECAF area are not addressed in the NP	
(c) Overall SGRN feels that the MS has mostly complied with	
the guidelines regarding the description of the collection of	
economic fleet variables. Further information and justification on	
the low sampling rate is needed. Further information on the	
estimation methodologies for costs is needed.	

PART 2 – SPECIFIC COMMENTS BY SGRN ON NP

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	SGRN considers that MS has mostly followed the guidelines.
	However, with regard to the report of the NP, the regional structure should be respected strictly. Also requested information should be given in the relevant sections of the report in order to facilitate the evaluation of the NP.
II Organisation of NP	SGRN considers that MS has followed the guidelines
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	SGRN considers that MS has followed the guidelines. SGRN identified catches reported in the CECAF area which have not been addressed in the NP.
III.B Economic Variables	SGRN feels that the MS has mostly complied with the guidelines
III.B.1 Data Acquisition	MS is asked to justify the low sample rate, describe data sources and provide reference dates and more information on methodology of some variables.
III.B.2 Estimation	MS is asked to provide more information on the estimation methods for costs.
III.B.3 Data Quality Evaluation	No comments
III.B.4 Data Presentation	MS is asked to provide more information on this
III.B.5 Regional Co-ordination	Not applicable.
III.B.6 Derogations and Non Conformities	MS is asked to provide further information and justification for the derogations. The text is not sufficient enough to judge what is currently being asked for.
III.C Biological – Metier Related Variables	North Sea & East Atlantic
III.C.1 Data Acquisition	 SGRN considers that MS has followed the guidelines mostly. There are small deviations between the listed fishing grounds and those listed in the 5th Liaison report. The description of sampling scheme 3 was not found in the report. The coding of the country and region is not consistent between tables III.C.3 and III.C.4 and according the guidelines

	• Table III.C.3 and III.C.4 partly provide the same information. Given the size of the table, there was no time to check consistency between these tables.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation	SGRN considers that MS has followed the guidelines
III.C.4 Data Presentation	
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	No derogations are requested
III.C Biological – Metier Related Variables	North Atlantic
III.C.1 Data Acquisition	 In tables III.C.3 and III.C.4 there is no sampling foreseen for mollusc dredges. see general comment NS00 The putting of similar métiers from North Atlantic and North Sea in one frame is not correct.
III.C.2 Estimation Procedure	SGRN considers that MS has followed the guidelines
III.C.3 Data Quality evaluation III.C.4 Data Presentation	SGRN considers that MS has followed the guidelines
III.C.5 Regional Co-ordination	SGRN considers that MS has followed the guidelines
III.C.6 Derogation and Non Conformities	No derogations are requested
III.D Biological – Recreational Fisheries	North Atlantic and North Sea & East Atlantic
III.D.1 Data Acquisition	SGRN considers that MS has followed the guidelines,
III.D.2 Estimation Procedures	SGRN considers that MS has followed the guidelines
III.D.3 Data Quality Evaluation	SGRN considers that MS has followed the guidelines

III.D.4 Data Presentation	No information is given on the time lag between data collection and availability to the end-user				
III.D.5 Regional Co-ordination	There is no regional coordination (but this is the same for all other nations)				
III.D.6 Derogations and Non Conformities	No derogations are requested				
III.E Biological – Stock Related Variables	North Sea & East Atlantic				
III.E.1 Data Acquisition	The percentages of EU catch are wrong in table III.E.1. Some are well over 100%				
III.E.2 Estimation Procedures	SGRN considers that MS has followed the guidelines				
III.E.3 Data Quality Evaluation	Potential sources of bias are not mentioned. See also general comment NS10				
III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines				
III.E.5 Derogations and Non Conformities	There are no requests for derogations and there are no nor conformities mentioned				
III.E Biological – Stock Related Variables	North Atlantic				
	 North Atlantic There are few species in table III.E.1 which are not planned to be sampled but which have landings above 200t A text table is provided in the NP proposal with comments on why a derogation is required for sampling some stocks. In this table: 1. some stocks appear which apply directly to the derogation rules (< 200t or <10% share), but not the entire list of stocks having this status. 2. Some stocks are not sampled because the first sale is in a foreign country. In this case, no mention on agreements or regional arrangements that the species/stock is sampled. No mention of precision target. SGRN advises MS to estimate precision of the stock variable parameters. (discuss and propose to delete) 				
Variables	 There are few species in table III.E.1 which are not planned to be sampled but which have landings above 200t A text table is provided in the NP proposal with comments on why a derogation is required for sampling some stocks. In this table: 1. some stocks appear which apply directly to the derogation rules (< 200t or <10% share), but not the entire list of stocks having this status. 2. Some stocks are not sampled because the first sale is in a foreign country. In this case, no mention on agreements or regional arrangements that the species/stock is sampled. No mention of precision target. SGRN advises MS to estimate precision of the stock variable 				

III.E.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines				
III.E.5 Derogations and Non Conformities	 see NS&EA derogations should be listed in this section There is no need to apply for derogations when the stocks do no qualify for sampling 				
III.F Transversal Variables	Mostly				
III.F.1 Capacity	No comments				
III.F.2 Effort	MS is asked to supply sampling protocol and methods used for vessels <8m				
III.F.3 Landings	MS is asked to provide information when monthly data is available				
III.G Research Surveys at Sea					
III.G.1 Planned Surveys	Maps of the survey grids are missing and should be provided				
III.G.2 Modification in the Surveys	SGRN considers that MS has followed the guidelines				
III.G.3 Data Presentation	SGRN considers that MS has followed the guidelines				
III.G.4 Regional Co-ordination	SGRN considers that MS has followed the guidelines				
III.G.5 Derogation and Non Conformities	SGRN considers that MS has followed the guidelines				
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry					
IV.A Collection of data Concerning Aquaculture	SGRN feel that MS has mostly complied with the guidelines.				
IV.A.1 General Description of the Aquaculture Sector	MS is asked to clarify, why carp aquaculture in cages in mentioned as Yes/No in table IV.A.1. Table IV.A.2: Land based farms/Hatchery and Nursery is mentioned twice for 2010 and not for 2011, it seems to be a typing error. MS is asked to fill in information for all three NP years. Table IV.A.3: MS has to fill in table for all NP years and all variables. Table to be completely revised.				

	MS is asked to clarify whether it follows the DCF regulation
IV.A.2 Data Acquisition	concerning the definition of the variables. MS is asked to clarify if all units according DCF regulation
	are included. MS is asked to clarify how to ensure consistency of the data.
IV.A.3 Estimation	MS is asked for more methodological details about how final estimates will be raised. Additionally details of estimating FTE and imputed value of labour are asked for.
IV.A.4 Data Quality	Method used for assessing the quality of the data to be completed for all variables in table IV.A.3.
IV.A.5 Presentation	No Comments
IV.A.6 Regional Co-ordination	No Comments
IV.A.7 Derogation and Non Conformities	No Comments
IV.B collection of data Concerning the Processing Industry	SGRN feel that MS has partly complied with the guidelines.
IV.B.1 Data Acquisition	MS is asked to list all reference years in table IV.B.1. Table IV.B.2 is missing, MS shall submit it. MS is asked for further description how the consistency of data coming from different sources will be ensured. MS is asked for further details about targets used to determine the sample size? Why have they been chosen?
IV.B.2 Estimation	Details especially for estimating FTE and imputed value of labor are asked for. MS is asked to take non-response into consideration.
IV.B.3 Data Quality Evaluation	MS is asked to give detailed information on methods, especially to submit a table IV.B.2
IV.B.4 Data Presentation	MS is asked for clearly addressing when the final data will be available. MS to clarify the reference years.
IV.B.5 Regional Co-ordination	No Comments
IV.B.6 Derogation and Non Conformioties	For enterprises that carry out fish processing but not as a main activity, it is mandatory to collect the following data, in the first year of each programming period: (a) number of enterprises; (b) turnover attributed to fish processing. To be addressed by MS.
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	Table V.1 is not filled in

VI Module for the Management and Use of Data	SGRN considers that MS has followed the guidelines
VII Follow up of STECF Recommendations	A list with STECF recommendations and UK response is missing.
VIII List of Derogations	SGRN considers that MS has not followed the guidelines. All derogations should be listed here including those obtained historically. The reference made in the table refer to biological stock sampling for stocks for which no derogation is required.
IX List of Acronyms and Abbreviations	SGRN considers that MS has followed the guidelines
X Comments, Suggestions and Reflections	The comments made by the MS are addressed at the Commission.
XI References	SGRN considers that MS has followed the guidelines
XII Annexes	This section comprises almost half of the report and was not considered in the evaluation of SGRN with the Exception of the bilateral agreements. Annex 1: Summary of subcontracting costs Annex 2: Data collection on eels and salmon
	Annex 3: Marine Scotland data collection: post-collection data checks/validation
	Annex 4: Agreed bilateral agreements with Belgium, Netherlands, Germany; Verbal agreement with Norway and Denmark; proposed agreement with Spain
	Annex 5: A review of surveys of marine recreational fishing activity around the United Kingdom

SECTION 2 General Comments on the Performance of the New Guidelines for the Submission of National Programmes (SGRN 09-03).

Section 7 gives detailed specific comments on the MS NP for each area. There were many issues raised during the evaluations which relate to MS <u>interpretation</u> of the existing guidelines (SGRN 09-03). However, it is also clear from the issues raised that SGRN must address the <u>consistency</u> of the evaluation process.

In February 2009, SGRN 09-03 highlighted the fact that there were no guidelines for the submission and evaluation of NP. Since then, guidelines for the submission of NP have been developed (SGRN 09-03).

There are still no formal guidelines for the evaluation of NP. This meeting developed an approach based on the questions from the SGRN 09-03 guidelines. A set of module specific questions were developed and these are given in Annex 5 of this report. Each NP was evaluated using these questions. The results of the evaluation were then presented in a table format (annex 4) which gave a brief summary of the NP and then gave detailed comment of the NP. A schematic of the evaluation process is given below (further details are given in Section 1).

In 2011, SGRN will review the module specific questions and the template used in the evaluation of the NP. This review will focus on two key areas. The first relates to whether the evaluation <u>questions are comprehensive</u> in relation to the information requested in guidelines. This will ensure a comprehensive and thorough evaluation process. The second area will address the issue of <u>standardisation of the response to each question</u> in the SGRN evaluation process (i.e. each MS is reviewed in a consistent manner).

SECTION 3 Response by MS to the call for Economic Data (Addressing TOR 2). Data Failures.

At their April 2010 plenary meeting, STECF stressed that the availability of high quality data collected under the DCF is of vital importance to STECF working groups (effort, Annual Economic Report etc.) and highlighted the existing problems with data deficiencies.

SGRN briefly discussed the response by Member States to the call for economic data in early 2010. There were clear data failures noted in this exercise. The economists at the meeting pointed out that a report from the JRC was being completed on this issue and that it would be available for the SGRN 10-02 meeting in July 2010. Therefore, SGRN concluded that this issue was more appropriate to the July SGRN review of the Technical Reports, supplemented with the JRC report.

SGRN note that there is a very heavy workload associated with the review of National Programmes (SGRN 10-01) and at the review of Technical Reports (SGRN 10-02). It may not be possible for SGRN 10-02 to deal with the issue of data failures in relation to the Annual Economic Report.

SECTION 4 Comments made by STECF (Addressing TOR 3). Data Deficiencies, Review of Surveys, Marine Strategy Framework Directive

and the DCF

SGRN discussed the comments made by STECF at their April 2010 plenary meeting. Three areas were identified for consideration by SGRN; data deficiencies; the review of surveys and the Marine Strategy Framework Directive and the DCF.

Data Deficiencies

STECF have stressed that the availability of high quality data collected under the DCF is of vital importance to STECF working groups (effort, Annual Economic Report etc.) and highlighted the existing problems with data deficiencies. Provision of data that is funded under the DCF is proving a problem for STECF, particularly in relation to economic and effort data. STECF stated that in principle, there should be no discrepancies in data and stressed the need for appropriate quality checks on all fisheries data used in support of fisheries management advice. Such discrepancies not only impact on the quality of assessment and advice, but also affect the distribution of sampling effort declared and carried out under the DCF. SGRN considered that this issue was more appropriate to review of the DCF Technical Reports that would be carried out at SGRN 10-02 in July 2010. As part of this review of MS Technical Reports, ICES would present the meeting with a database of the various DCF data sets made available for stock assessment and time permitting, this template and procedure for reporting data deficiencies by data end users (i.e. ICES) could be further developed.

Review of Surveys

The Commission updated SGRN on progress in relation to the review of surveys to be undertaken in 2010. A chair will be appointed shortly and the collation of information in relation to surveys is nearing completion. In general, the overall scheme outlined in SGRN 09-04 is being followed and is on schedule.

The Marine Strategy Framework Directive and the DCF

SGRN has been asked by STECF (April 2010 Plenary) to address the collection of data under the MSFD. SGRN would point out that the data collected under the DCF framework, particularly under the scheme for research surveys at sea, (Council regulation (EC) No 199/2008) can contribute to the development of indicators that address some of the descriptors in Annex 1 of the MSFD. The Ecosystem Approach to the management of human activities is a cornerstone of both the CFP and the MSFD.

In 2008, the EU Commission published a Directive establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive - MSFD). The MSFD establishes a framework within which Member States shall take the necessary measures to achieve or maintain Good Environmental Status in the marine environment by 2020 at the latest. Marine Strategies shall be developed and implemented in order to protect and preserve the marine environment, prevent its deterioration or, where practicable, restore marine ecosystems in areas where they have been adversely affected. The strategies must also prevent and reduce inputs in the marine environment, with a view to phasing out pollution so as to ensure that there are

no significant impacts or risks to marine biodiversity, marine ecosystems, human health or legitimate uses of the seas.

The MSFD will apply an ecosystem based approach to the management of human activities contribute to coherence between, and aim to ensure the integration of environmental concerns into the different policies, agreements and legislative measures which have an impact of the marine environment (e.g. Common Fisheries Policies). The reform of the CFP should take account of the environmental impacts of fishing and the objectives of the MSFD.

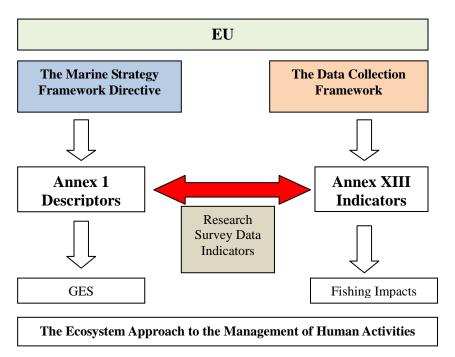
The MSFD requires Member States to establish a comprehensive set of environmental indicators so as to guide progress towards achieving Good Environmental Status (GES) in the marine environment. To determine the characteristics of GES in as marine region, Member States shall consider 11 descriptors (Annex 1 MSFD) in order to identify those descriptors which are to be used to determine GES. These descriptors are;

- (1) Biological Diversity is maintained
- (2) Non Indigenous Species introduced by human activity are at levels that do not adversely alter the ecosystem
- (3) Populations of commercially exploited fish and shellfish are within safe biological limits, exhibiting a population age and size distribution that is indicative of a healthy stock
- (4) All elements of marine food webs , to the extent that is known, occur at normal abundance and diversity and levels capable of ensuring the long term abundance of the species and the retention of their full reproductive capacity
- (5) Human induced Eutrophication is minimized, especially adverse effects thereof, such as losses of biodiversity, ecosystem degredation, harmful algae blooms and oxygen deficiency in bottom waters
- (6) Sea Floor Integrity is at a Level that ensures that the structure and function of the ecosystem are safeguarded and benthic ecosystems, in particular , are not adversely affected.
- (7) Permanent Alteration of hydrographical conditions does not adversely affect marine ecosystems
- (8) Concentrations of contaminants are at levels not giving rise to pollution effects
- (9) Contaminants in fish and other seafoods for human consumption do not exceed levels established by Community legislation or other relevant standards
- (10) Properties and quantities of marine litter do not cause harm to the coastal and marine environment
- (11) Introduction of energy, including underwater noise, is at levels that do not adversely affect the marine environment

In order to evaluate the effects of the fisheries sector on the marine ecosystem, the DCF requires Member States to collect data to allow the calculation of indicators listed in Annex XIII (Commission decision 949/2008). These indicators include;

- (1) The Conservation Status of Fish Species
- (2) Proportion of large fish
- (3) Mean Maximum length of fishes
- (4) Size at maturation of exploited fish species
- (5) Distribution of fishing activities
- (6) Aggregation of Fishing activities

- (7) Areas not impacted by mobile gears
- (8) Discarding rates of commercially exploited species
- (9) Fuel efficiency of fish capture.



Schematic to show the linkage between the MSFD and the DCF.

The table below indicates how DCF survey data could contribute to the development of indicators that meet the objectives of the MSFD. SGRN suggests that this table could form the basis of discussions on the future input of the DCF to the MSFD.

DESCRIPTORCOLL FROM SUDescriptor 1Species Distribution, Population Size and Population Condition (from a set of relevant species and functional groups)Can be collected fisheries SurveyBiological Diversity is MaintainedSpecies Distribution, Population Size and Population Condition (from a set of relevant species and functional Species DistributionCan be collected fisheries Survey	ETER TO
Descriptor 1Species Distribution, Population Size and Population Condition (from a set of relevant species and functional groups)Can be collected fisheries SurveyBiological Diversity is MaintainedSpecies Distribution, Population Size and Population Condition (from a set groups)Can be collected fisheries Survey	LECT
Biological Diversity is Maintainedand Population Condition (from a set of relevant species and functional groups)fisheries SurveyLook at relevant Functional Group	URVEYS
Functional Grou	d from existing ys
Abundance also Indicators (e.g. S Ratio)	ups ution and o Population

SGRN 10-01 - Suggested ways in which existing DCF survey s could be used to collect data
that contribute to the objectives of the Marine Strategy Framework Directive.

	Habitat Distribution, Extent and Condition	Condition of the typical species and Communities, relative Abundance and/or Biomass Extra resources needed but can do habitat mapping on fish surveys (i.e. research vessels can run acoustic equipment during night hours – this needs to be done in many cases when searching for new fishing tows . Grab or core samples could be collected from ground truthing. At a very broad level demersal fish species and benthic shellfish can be indicative of habitat types and their abundance and distribution can infer habitat types (e.g, Nephrops –muddy habitat; lumpsucker- rocky outcrops). There are publications on linking certain fish communities with habitat types.
		Benthic invertebrates from trawls can also be used as indicator species from certain habitats.
	Ecosystem Structure	Analyses of ecological parameters of fish community can be carried out with indicators (e.g. conservation of large fish and mean maximum length (existing DCF indicator), species diversity and evenness indicators
Descriptor 2 Non-Indigenous species introduced		Trends in Abundance, temporal and spatial distribution of invasive species

by human activities Descriptor 3 Populations of all commercially exploited fish and shellfish		Ratio between invasive non indigenous species and native species in fish community (From fisheries surveys – data already collected) Already Addressed in DCF.
Descriptor 4 All Elements of the marine food webs occur at normal abundance and diversity.	(Further development of criteria will be carried out) Productivity (production per unit biomass) of key species or trophic groups/species	Abundance/distribution of key trophic groups/species. The EC decision on MSFD already lists a number of indicators that are collected from fisheries surveys that address this descriptor, such as large fish indicators, abundance trends of pelagic fish species, of migrating species like salmon, eels, etc. However, DCF fish surveys could also collect data for other indicators within this descriptor at little extra cost as follows; - Acoustic fish Surveys collect data on the planktonic scattering layer including its thickness and intensity. Some additional sampling could characterize this layer (main zooplankton taxa etc.). Indicators could be

Descriptor 6 Sea Floor Integrity	Extent of the Seabed significantly affected by human activities	 derived to have abundance/productivity estimates. There are large scale DCF fish plankton surveys (mackerel, cod, anchovy egg surveys; herring larval). Plankton samples collected from these surveys could be used as estimates on abundance / distribution of key trophic species (e.g. Copepod or jelly Fish weight , total plankton weight). In general fish surveys in Spring / Summer could be used to measure chlorophyll and zooplankton biomass. On board sea bird and sea mammal observers could collect data on top predator abundance. Fishing effort from VMS data already collected by the DCF.
	Condition of Benthic Community (a number of indicators/criteria are suggested)	Crab samples can be collected on demersal fish surveys, otherwise recording and enumeration of benthic indicators species caught in fishing trawls
Descriptor 7 Permanent Alteration of hydrographical conditions does not adversely affect marine ecosystems	Impact of permanent hydrographical changes Changes in habitat, in particular the functions provided (e.g. spawning, breeding and feeding areas and migration routes of fish, birds, and mammals), due to altered hydrographical conditions.)	This parameter can be estimated from fish surveys - change in the distribution, spawning and migration routes of fish (provided that the area is covered the relevant fish surveys).
Descriptor 10 Properties and Quantities of marine	Litter in the water column deposited on the sea floor, composition, spatial distribution, source.	DCF surveys could address this issue by recording marine litter caught in the trawls with little extra effort . Some

litter do not cause harm to the coastal and marine environment		surveys such as IBTS are doing this already (e.g. WGIBTS 2010)
environment	Litter ingested by marine animals (e.g. stomach analyses)	DCF surveys could collect data for this by carrying out selected stomach analysis sampling.

Several issues in relation to the collection of additional data for the MSFD were brought up by SGRN. Existing data sets will need to be analysed and this will require additional staff input. The collection of additional data on surveys will require additional staff and the compilation of protocols. Furthermore, some surveys are fully staffed and the vessels do not have space for additional staff. Additional data will result in additional staff costs and it is unclear who would meet these additional costs. The collection of additional data may alter the survey design. Into the future, we may have to regard surveys as "marine data collection platforms" as opposed to "CFP data collection platforms". These were some of the issues identified in the initial discussions of SGRN.

In order to further explore how the DCF can assist the MSFD, SGRN recommends that a Study Group on DCF data and the MSFD (SGDCMS) be established and meet in early 2010. Participants should consist of a mix of MSFD and DCF experts. A proposed terms of reference of this study group are;

- (4) to examine the descriptors listed in Annex 1 of the MSFD with their associated indicators and data requirements
- (5) to examine how the current data collected under the DCF could be used to generate indicators for the MSFD descriptors. The DCF data sets should be confined to those generated from at sea surveys.
- (6) to examine if new data sets could be collected under the DCF and used to generate indicators for the MSFD descriptors. The proposed new data sets should be confined to those generated from at sea surveys under the DCF.

SECTION 5 Comments made by 7th Liaison Meeting (Addressing TOR 4).

It was not possible to carry out a detailed review of the 7th Liaison Meeting draft report during the meeting due to time pressures. However, on the last day of the meeting the Chair (PC) and JV went through the 7th LM recommendations (from the draft report) and found that most of the recommendations of relevance to SGRN had been followed up at this meeting.

Many will be addressed at the review of the Annual Reports in July (SGRN 10-02), in the review of the guidelines and at the SGRN strategic meeting planned for early 2011.

SGRN briefly discussed the current status of the Regional Database (RDB) issue. The RDB meeting proposed by SGRN 09-04 took place in Brussels in February 2010 (Regional scenarios and roadmap on Regional Database: A report compiled at the regional workshop, Brussels 22-24 February 2010. (REF MARE REG/C3(2010)D/638)). The various Regional Coordination Meetings (RCM's) have reviewed this report during their April-May 2010 meetings. The RCM Baltic agreed to use FishFrame as a RDB. The RCM NS&EA have agreed to use a disaggregated RDB. The RCM Med&BS considers that no RDB is necessary and that there are existing survey data bases in use and that data from JRC data calls should be accessible. The RCM LDF noted that databases are available from ICCAT and other relevant RFMO's.

At the RCM NA, a RDB steering Group was proposed. SGRN supports this proposal and considers that this group should deal with the Baltic, NS&EA, and the NA regions, as the majority of the requirements of a RDB are pan European. The level of implementation will differ between regions. The first meeting of the RDB Steering Group is scheduled to take place in Autumn 2010 (Chair Katja Ringdahl).

Section 7 presents the comments and recommendations from the four area based evaluations (biological) and the economic evaluations carried out during the meeting. Many of these general comments and recommendations were discussed in plenary and where appropriate, SGRN have made recommendations on a way forward. Overall, these comments will be used in the review of the guidelines for submission of NP and in the review of the evaluation of NP process used by SGRN. The section also includes comments made by MS which will also be used in the 2011 review.

7.1 General Comments and Recommendations on NP from Baltic Sea Area Evaluations

B1. Salmon river monitoring (Comment on NP Guidelines). Data collection on salmon river monitoring is difficult to present using standard tables. Some of the countries have "forced" salmon data collection details into the standard tables, others give salmon details in the text part only. A common approach is needed, since it would make it possible to evaluate the different MS in a consistent manner. This could be a task for the RCM. SGRN recommends that Sweden in correspondence with Estonia and Finland develop the table by September 2010 to be agreed by STECF by correspondence.

B2. Some member states plan to sample data on stock-level variables for **triennial species annually**. Others plan a triennial approach. A common approach in the Baltic would be desirable. In many cases collection of annual data does not cause remarkable extra costs, since métier-level variables are sampled anyway. Task for RCM to decide? SGRN recommend that MS follow the RCM recommendations (previous SGRN recommendations should be inserted)

B3. In many cases MS did not fully follow the guidelines in **structuring their NP's**. E.g. 4th level headings missing, information placed elsewhere in the report than guidelines suggest. This makes the review of the report difficult and time-consuming. MS should pay more attention the structuring their future NPs. SGRN emphasizes that MS should stricktly follow the Guidelines.

B4. To make the review process easier, all standard **tables should be presented as Excel-files**, **not in .pdf format.** SGRN emphasizes that MS should use Excel format as specified in Guidelines.

B5. National **databases** are still under development even after they are formally finished and running. The continuous need for updates rises from changes in data collected but also from changes in format of data asked by the end users. DCF brought new modules into data collection and new requirements for the databases, so it is understandable that databases are under development. Therefore SGRN recognizes that the developing of national databases is inevitable for MS.

7.2 General Comments and Recommendations on NP from MED&BS Area Evaluations

1. Sampling of sharks, implications for table III_C_5, III_C_6 and III_E_1.

Italy, in their NP proposal, comments upon the large selection of sharks in appendix VII to sample for biological variables. The MS seeks clarification from the European Commission on which biological variables to be sampled and if precision level should be associated to the collection of both metier and stock.

The issue has been discussed at the RCMMed&BS

RCMMed&BS was critical with the (too large) proposed list for the Mediterranean since some of the proposed species are presumably not present in the supra-region. The group pointed out also about the necessity of clarify which biological variables should be sampled in each case of Appendix VII. RCM supports the idea to collect, as a first estimation, the metier based variables for these species (i.e. length structures of landings or of catches if sampling at sea). Additionally, RCM noted that the sampling of sharks in the routine concurrent sampling schemes, poses a number of problems for certain metiers. The sampling of just a few shark individuals in these metiers, forces to largely increase the sampling effort, and decrease significantly the efficiency of the sampling for commercial species. It is also stressed that no precision target could be reached for Elasmobranches. Therefore, no minimum number or sampling strategy should be associated to the collection of all the "sharks" species reported in the new Appendix VII (Commission Decision 93/2010.

SGRN further notes that landings of individual shark species often are below the 200 tonnes exemption rule threshold for individual MS (although not all MS have filled in al shark species in tables III_C_5 and III_E_1 (see comments for individual MS).

SGRN, revising the comments of the RCMMed&BS, supports the idea to collect the metier based variables (i.e. length) for all the shark species present in the Appendix VII (Commission Decision 93/2010). SGRN stress that no derogations on individual species are accepted for length measurements within metier sampling and that all MS should fill in tables III_C_5 and III_C_6 (only TR) completely, including all appendix VII species in the region. This will allow SGRN (and RCMMed&BS) to evaluate the overall level of length sampling of sharks in the future.

MS should fill in tables III_E_1 completely, including all appendix VII species in the region. This will allow SGRN (and RCMMed&BS) to evaluate which shark species that should be sampled for biological variables in accordance with the DCF rules and which MS that have an obligation to participate in this sampling.

SGRN suggest biological information to be collected primarily at surveys and the issue should be considered by the MEDITS and MEDIAS steering groups.

2. Timing for data availability for biological data in the region.

SGRN prepared a table on when different kind of data collected under DCF region of Mediterranean and Black Sea will be available for end users.

	Countries							
	Cyprus	France	Italy	Malta	Romania	Bulgaria	Slovenia	Spain
Metier variables IIIC4	- one year	- 4 months	- 6 months	- 5 months	Not specified	- 4 months	- ? months (in January next year)	5 months
Recreational IIID4	- one year	- 5 months	Not specified	Not applicable.	Not applicable.	- one year	- 2 months	- 3 months (tuna)
Stock variables IIIE4	- one year	Not specified	Not specified	Not specified	Not specified	- 4 months	- on request	- 5 months
Surveys III G4	- one month	- one year	- 6 months	Not specified	Not specified	- 3 months	- one month	- at request

A key question is when should data be available (i.e. what is an acceptable time lag - 5 months?) (GFCM recommedation 2009/33/3). ICCAT requirements are in September.

Reference to 93/2010.

Within their National Programmes most MS make reference to the former Commission Decision 949/2008. The present Decision in force is 93/2010. MS should refer to this document.

3. General Comments

Ecosystem indicators data availability

The Council Regulation (EC) No 199/2008 (article 9 2(b)) requires MS to in their sampling programmes include a sampling design for ecosystem data allowing for estimation of the impact of the fisheries sector on the marine ecosystem as well as contributing to the monitoring of the state of the marine ecosystem. The indicators for this estimation are specified in the EC Decision 2010/93/EC appendix XIII. Most of the data needed to support the ecosystem indicators are, and have historically been, collected within other parts of the DCF (research surveys, discard sampling) or the control regulations (VMS). MS are within their national programmes (table V_1) collecting the data to support the ecosystem indicators.

For many of the indicators, are a time-series needed for end-users to use the indicator in order to evaluate the impact on fisheries on the marine ecosystem. In accordance with 199/2008 (article 18-20) shall MS make detailed and aggregated data available to end-users to support scientific analysis. However, SGRN realises that strictly this only is valid for data collected within the present DCF (2009 onwards). Availability of data collected prior to 2009 is however in many cases needed by the end-users in the usage of the indicators. When the former sampling protocol allows for it, SGRN recommends MS to provide historical information, as far back in time as possible, Absence of such data may restrict the analyses.

Target and Samplin Frames.

Sampling of metiers; Target populations and sampling frames

It was recognised in ICES WKPRECISE (ICES, 2009) that the metiers defined in the

Comm. Dec. 949/2008/EU were relevant as a stratification for analysis, but proved to be problematic as stratification for sampling plan. The reasons are twofold: their dynamic profiles and the difficulty of a priori identification of a metier. It was thereby suggested that metiers should be treated as domains instead of strata, see Cochran (1977) for all details. The consequence of this concept is that one sampling stratum/frame can include more than one metier i.e. several metiers are sampled within one sampling frame. This way of doing is said to enable more randomness in the sampling protocol and more control on the number of trips planned by frame, but as a consequence implies that the exact the number of trips to be sampled for each metier becomes only indicative.

The ICES WKPRECISE was followed by ICES WKMERGE (ICES, 2010). One important role of the WKMERGE was to give Member States guidance on the design of robust sampling schemes for at-sea sampling and on-shore sampling to provide data on metier based biological variables. This included how to identify target populations, domains, sampling frames and associated primary sampling units. SGRN recommends MS to refer to ICES WKMERGE (ICES, 2010) for guidelines how to use sampling frame and how to estimate parameters based on this concept, and follow the recommendations section listing the key features of good sampling schemes for at-sea and shore based sampling.

The concept of metiers as domains instead of strata was taken up in the guidelines for the National Programmes 2011-2013 were Member States were asked to provide details on their sampling frames in table III_C_4. MS were further asked to provide justification and rationale for different chosen sampling schemes. In this context is it important to clarify if the sampling frames cover the entire target populations (in DCF the activity of the metier) or if certain parts are excluded for different reasons (e.g. vessels to small to carry observers, vessels in remote locations).

SGRN notes that many National Programme proposals would have benefited from more thoroughly descriptions of the sampling designs, and **recommends MS to make this description effort when revising their programmes 2012-2013.**

Working with sampling frames and metiers as domains, following the guidelines, resulted to some confusions, leading to different understandings and errors in the tables III C 3 and III_C_4 within MS NP proposals 2011-2013. SGRN proposes below to show by the example how to fill correctly these 2 tables. Starting from the examples in table III_C_4 available in the guidelines version 2009 (Table 7.1), slightly modified for a better understanding, a transition table is built by splitting the number of trips sampled at sea and on shore from each of the sampling frames. For example, sampling frame A2 is gillnetters >=10m. and from the known statistics, this frame is composed of 2 metiers GNS DEF 100-119 0 0 and GTR DEF 80-99 0 0, where effort is currently about 40% and 60% respectively. Hence, the 10 samples planned for this frame is expected to provide 4 samples for GNS and 6 for GTR. Compiling the transition table by metier and sampling strategy will provide all entries for table III_C_3 (table 7.3). The examples below also show that it is possible to consider one metier as one sampling frame, like the beam trawlers targeting sole (sampling frame B1 in tables 7.1. and 7.3). SGRN advises MS to build this transition table before filling the information from Table III_C_4 into table III_C_3.

Sampling frame code	Sampling frame (fishing activities)	Sampling frame (geographical location)	Sampling frame (seasonality)	Sampling strategy	trips to be sampled at	Planned no. trips sampled on shore by MS	sampled by
A1	Polyvalent <10m	Le Havre – Dunkerque	March – Oct	Concurrent	34	16	50
A2	Gillnets >= 10m	Le Havre – Dunkerque	Feb – Sept	Concurrent		10	10
A3	OTB inshore (>=10m)	Le Havre – Dunkerque	All year	Concurrent	25	10	35
A4	OTB targeting saithe	Le Havre – Dunkerque	All year	Other [Market stock specific sampling]		10	10
B1	Beam trawlers	North Sea	All year	Concurrent at sea	7	-	7

Table 7.1. Excerpt from table III_C_4 in the guidelines tables version 2009 (modified).

Table 7.2. transition table from III_C_4 to III_C_3

	Information	from Table III_	Split by metiers				
Sampling frame code	Sampling frame	Sampling strategy	Planned number of trips at sea	Planned number of trips on shore	Metier LVL6	Expected number of trips at sea	Expected number of trips on shore
Al	Polyvalent <10m	Concurrent	34	16	OTB_DEF_100-119_0_0	4	0
					OTB_DEF_80-99_0_0	12	6
					GNS_DEF_100-119_0_0	10	5
					GTR_DEF_80-99_0_0	8	5
A2	Gillnets >=10m	Concurrent	0	10	GNS_DEF_100-119_0_0	0	4
					GTR_DEF_80-99_0_0	0	6
A3	OTB inshore (>=10m)	Concurrent	25	10	OTB_DEF_100-119_0_0	10	5
					OTB_DEF_80-99_0_0	15	5
A4	OTB targeting saithe	Other [Market stock specific sampling]	0	10	OTB_DEF_100-119_0_0	0	10

Table 7.3. resulting table III_C_3 from the transition	on table.
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Metier LVL6	Sampling frame codes	Sampling strategy	Expected no. trips to be sampled at sea by MS	Expected no. trips sampled on shore by MS	Expected total no. trips to be sampled by MS
OTB_DEF_100-119_0_0	A1, A3	Concurrent	14	5	19
OTB_DEF_100-119_0_0	A4	Other [Market stock specific sampling]		10	10
OTB_DEF_80-99_0_0	A1, A3	Concurrent	27	11	38
GNS_DEF_100-119_0_0	A1, A2	Concurrent	10	9	29
GTR_DEF_80-99_0_0	A1, A2	Concurrent	8	11	34
TBB_DEF_>=120_0_0	B1	Concurrent	7	0	7

SGRN recalls the statement made in SGRN-09-04 report (STECF 2009), that information provided in Table III.C.3 (Metier sampling) becomes the expectation and the sampling frame (from Table III.C.4) becomes the plan on which SGRN will have to assess (i) the scientific relevance of the sampling frame for sampling metiers and (ii) the sampling achieved.

References cited in Section 7

Cochran, W.G. 1977. Sampling Techniques 3rd ed. John Wiley & Sons, New York, NY.

Commission Decision 2008/949/EC. Adopting a multiannual community programme pursuant to Council regulation (EC) no 199/2008 establishment of a Community Framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy.

STECF 2009. Report of the STECF Sub-group on Research Needs; Report of the STECF-SGRN-09-04: Evaluation of 2010 Revised National Programmes and a Roadmap

for the Review of Surveys. 7 – 11 December. Hamburg, Germany. 90 pp.

ICES 2009. Report of the Workshop on methods to evaluate and estimate the precision of fisheries data used for assessment (WKPRECISE). 8-11 September 2009 Copenhagen, Denmark. ICES CM 2009/ACOM:40. 43 pp.

ICES 2010. Report of the Workshop on methods for merging metiers for fishery based sampling (WKMERGE). 19-22 January 2010 Copenhagen, Denmark. ICES CM 2010/ACOM:40. 100 pp.

Guidelines

Some inconsistencies in the instructions for how to fill in the tables - lvl 5 should be name of target species (appendix IV) not code. See review of guidelines North Sea

7.3 General Comments and Recommendations on NP from North Atlantic Area Evaluations

The merging fishing grounds in table III.C.2 (covered)

Reassessing 2009 SGRN comment to sample metier targeting G3 species – SGRN considers this a Strategic Issue and that it may require an upgrade some G3 into G2 ?

SGRN notes that MS require time to adjust their NP after LM recommendations. SGRN notes that this year it was not possible for MS to adjust their programmes as the LM meeting took place in early June. The planning of future meetings related to the DCF must be carefully scheduled to allow consideration of appropriate reports.

SGRN have previously stated that there is a need to evaluate NP in advance of the meeting (SGRN 09-02). The pre screening will allow for a more efficient and effective NP evaluation meeting. The present system where evaluations are cnducted without pre screening places an excessive worklod of participants.

In the review of the guidelines SGRN recommends that there are clear instructions to MS on what is expected in relation to description of methodologies.

Recreational Fisheries : Derogations Demanded

SGRN-08-02 (Ispra, July 2008) - In accordance with the provision of the DCR, MS are obliged to sample recreational fisheries of cod, salmon and bluefin tuna in EU waters. STECF (STECF November 2007) has already stated that the developing and agreement of a standard methodology for sampling recreational fisheries is a crucial issue that should be tackled in the near future and the process should also involve ICES through ad hoc workshops. It is clear that all MS should evaluate the recreational fisheries as required in the current and future DCR. However, it is also fundamental to develop a "follow up strategy" **after robust estimates of recreational catches become available**. In addition to international obligations (e.g. reporting recreational catches of bluefin tuna in ICCAT), SGRN suggests that:

- When catches of aggregated recreational fisheries (all MSs catches combined) are less than 5% of the total catches of the stock, only update estimates should be mandatory once every five years, for example, within DCR.
- When catches of aggregated recreational fisheries (all MSs catches combined) are between 5-10% of the total catches of the stock, MSs should coordinate and develop (through Regional Coordination Meetings) sampling of recreational fisheries catches in order to estimate total quantity landed but would be exempted from sampling for length.
- When catches of aggregated recreational fisheries are more than 10% of the total catches of the stock, MS should coordinate and develop (through Regional Coordination Meetings) a monitoring and sampling scheme of their recreational fisheries catches in order to estimate both total quantity landed and length structures.

7.4 General Comments and Recommendations on NP from North Sea Area Evaluations

NS 01: Module Biological Métier related variables:

For almost all countries, the application of DCF rules used for indentifying métiers to be sampled, have led to the identification of large numbers of métiers. The requirements to sample these métiers with the required precision often exceed the available resources. This has led to the situation that for some of the métiers no sampling is proposed or sampling levels are proposed for which it is unlikely that the required precision is met. SGRN considers this to be a major strategic issue to be considered at the proposed SGRN meeting, February 2011

NS02. Review of DCF

There is a clear need to start looking into a strategic approach of the needs of reviewing the current DCF/Decision/guidelines, for the period 2014 - 2019. SGRN July – review guidelines TR: list of items need to be made.

NS03. Review of Tables

SGRN note that MS are asked for identical information in different tables and that this can lead to inconsistencies between the tables. SGRN July – review guidelines TR: list of items need to be made.

NS04. Merging Across Regions

Merging across regions is done in several MS, is discussed in RCM's, no reference in guidelines

Table III.C.2 – SGRN considers that merging across regions & fishing grounds is not appropriate, and recommends MS sampling frame reflects the broader geographical area of the métier.

NS05. Evaluation

MS put a lot of effort in compiling the NP for three years, not easy to do justice to this effort in doing the evaluation as done at present. SGRN would like to point out that the evaluation is reactive to the material presented by the MS.

NS06. Metiers and Incomplete Data

SGRN point out that it is unclear how do MS deal with incomplete logbooks? Ex: derogation NL for métier MIS_UND_0-0; if this métier is significant: in- or excluding can have effect on whole selection. SGRN recognizes this is an issue in several MS. SGRN suggests that this group is classified as an unknown métier and to investigate the compliance issue.

NS07. Emerging or Disappearing Metiers

Sgrn considers the Métier approach as a dynamic approach: what if in the program period a new métiers emerge, disappear? SGRN considers this to be a major strategic issue to be considered at the proposed SGRN meeting, February 2011

NS08. Sampling Codes

Sampling frame codes table III.C.3 & III.C.4: in many MS this is missing or inconsistent between the two tables and the guidelines are not clear in explaining what is meant. SGRN will clarify this in this the review of the Guidelines.

NS09. Table III.C.5

Table III.C.5: guidelines not clear enough in explaining headings and table is incorrect (ex: length/age). SGRN July – review guidelines TR: list of items need to be made.

NS10. Bias in Biological Stock Parameters

Section III.E.3: The occurrence of bias in biological stock parameters is likely if these are based on national data covering part of the stock. This is in most cases the situation. However, in most cases national derived biological parameters are representative for the national catch. SGRN considers this to be a major strategic issue to be considered at the proposed SGRN meeting, February 2011

NS11. Table III.E.3

Table III.E.3: required precision target/planned minimum of individuals at national level: some MS do CV, some min number, some both: is this all clear enough to MS? See recommendations SGRN_09-03.

NS12. Appendix VII

Appendix VII internally inconsistent, ex: some stocks overlapping in area, RCM has identified this as an issue and is investigating the discrepancies

NS13. Table III.E.1

Table III.E.1: heading area/stock is mixture of different classification variables, should be stock. SGRN July – review guidelines TR: list of items need to be made

NS14. Level 5.

There are some inconsistencies in the tables how to fill in the tables regarding level 5. SGRN July – review guidelines TR: list of items need to be made

NS15. RCM and SGRN

Acceptance of RCM recommendations by SGRN. SGRN agrees with the justification of a derogation requested by the MS, under condition that the relevant references of documentation is available to the EC. This documentation can be based on either scientific, economic or accessibility issues.

NS16 Improving the Guidelines

Before writing the NP, a short list of terminology/words should be available to MS on 'what they are expected to write?' . This will have impact on more 'to the point' writing by MS, more efficient evaluation, comments more directed., etc... The evaluation form used by SGRN should also be made available for MS. SGRN recommends that a preelimanary list of questions is available to the MS and is included in the guidelines.

N17. Data Base of Recommendations

Recommendations: selection of still valid-actual recommendations which should be addressed by the MS could be presented at the end of the NP in analogy with the overview of the derogations. The list can consist of all recommendations addressed to MS in general and recommendations addressed to MS individually. During evaluation, SGRN is then aware of which recommendations should be addressed by MS. Clear outline where a recommendation applies to is needed as well. Database on

recommendations is advisable as well in order to keep track of history and follow-up of recommendations by MS. Following RCM NA 2010 recommendation, ICES agreed to investigate the setting up of such a database.

N18 Update of NP

MS need/have to update their proposals after the relevant RCM recommendations before evaluation takes place. *SGRN endorses this.*

N19. Table III.E.1

Evaluation: table III.E.1 should contain the full list of stocks as in Appendix VII, some MS do not provide the full list, only the list. SGRN July – review guidelines TR: list of items need to be made

N20. Derogation Duration

Derogations: can this be granted for the three year period? SGRN points out that any derogation granted will be valid for three years unless the RCM's recommends otherwise.

N21. Derogations and Non Conformities

The issues of derogations and NC should be two distinct questions. SGRN agrees this should be two questions in future evaluations.

N22. RCM Recommendations

RCM recommendations: can only be answered for first year, the recommendations of RCM 2012 & 2013 are not known yet. SGRN agrees.

N23. Overview of RCM Recommendations to MS

An overview of valid, MS directed RCM recommendation + history in NP at end is favorable, (cfr overview list of derogations). SGRN July – review guidelines TR: list of items need to be made.

NS24.

III.E.1: full appendix VII should be presented in the Table (see guidelines), most MS only select stocks they are involved in. See NS16

NS25. Guidelines for Evaluation of NP

A lot of space for subjectivity & inconsistency is present in the way the evaluation is done; it is advisable for future evaluations of NP & TR to have template and guidelines for evaluation available. This will be covered in the part of the review of the guidelines. SGRN July – review guidelines TR: list of items need to be made

7.5 General Comments and Recommendations on NP from Economic Evaluations

General comments regarding fleet economic data

- 1. Overall the MSs mostly complied with the guidelines provided by STECF. The guidelines have been really helpful in both the compilation and the structuring of the NPs.
- 2. Overall the MSs need to provide more detailed information on the methods used to collect and analyze economic variables which are not clearly defined in the commission decision (capital value and costs, value of quotas and fishing rights, FTE national, imputed value of unpaid labor and fuel efficiency of fish capture).
- 3. Overall most of the MSs need to provide more detailed information and description about the methodologies applied in the estimation process of the economic variables, the methods used to provide measures to assess data quality (variability and accuracy indicators).
- 4. Overall most MSs did not provide information for inactive vessels. SGRN invites the MSs to provide information on inactive vessels in the NPs.

General comments regarding transversal variables

- 1. Overall the MSs mostly complied with the guidelines provided by STECF. The guidelines have been helpful in both the compilation and the structuring of the NPs.
- 2. Overall most of the MSs need to provide more detailed information and description about data acquisition and the methodologies applied to provide measures to assess data quality.
- Many MSs a need for derogation on the collection of effort variables that cannot be collected because not included in the logbook. SGRN suggests that all the variables that are required by DCF should be collected by including them in the logbooks.

General comments regarding the fish processing industry

- SGRN recommends MSs to consult with the national statistical offices in order to improve efficiency and guarantee consistency in the data collection process. Efficiency can be improved because national statistical offices could already have information required to be collected under the DCF. Data consistency will be met if the same definitions are applied.
- 2. Overall most of the MSs need to provide more detailed information and descriptions of the methodologies applied in the estimation process and are required to explain the methods used to provide measures to assess data quality (variability and accuracy indicators).

3. Overall the MSs need to provide more detailed information on definition and the methods used to collect and analyze the variable "Financial Cost" which is not clearly defined in the commission decision.

General comments regarding the aquaculture sector

1. Overall most of the MSs need to provide more detailed information and description about the methodologies applied in the estimation process and are required to explain the methods used to provide measures to assess data quality (variability and accuracy indicators).

General issues and suggestions

- 1. SGRN has attempted to evaluate Regional and international coordination issues but this turned out to generate potential inconsistent evaluations given the lack of a standard benchmark (list of RCM recommendations) against which check the information provided by each MS. SGRN acknowledges that, for the time being, there are no direct RCM recommendations applicable to MS regarding economic data collection. Nonetheless, SGRN suggests this issue to be discussed in more details in the future in order to come up with a more suitable way (different question in the checklist) to check the information provided by each MS. Perhaps, to ease this process, the EU Commission could provide MSs with a full and updated list of RCM and former SGRN/STECF recommendations in order to allow each MS to check it and provide detailed information on those recommendations that they need to follow.
- 2. SGRN acknowledges the difficulties faced by MS in collecting, describing and analyzing variables that are not well described by DCF recommendations and strongly recommends MSs to participate in the workshops specifically targeted to address these issues (i.e. workshop on capital value).
- 3. SGRN acknowledges difficulties faced by some MS collecting and estimating some transversal variables. SGRN feels that the métier concept is hard to grasp for non-biologist and recommend that a workshop including biologist, economists and people involved with enforce and control to discuss and reach a common understanding of the métier concept as well as methods to collect these variables when census data (e.g. logbooks) is not available.
- 4. SGRN strongly suggest the idea of a pre-screening of the NPs before the SGRN evaluation in order to use the time during the meeting more efficient.

General comments regarding AER

Due to the tight time schedule of SGRN 10-01 the evaluation of and comments on the Annual Economic Report 2010 is postponed to SGRN 10-02.

7.6 Comments, Suggestions and Reflections From Some Member States

Spain

SGRN-ECA 09-01, held in Bilbao in February 2009, made the following recommendation: "SGRN propose that a column indicating the length of the fishing season and average fishing trip is included in the NP (Table IIIC.3)"

A column needs to be added in table III_C_5 referring to the stock, as stock and fishing ground frequently do not coincide and there are cases where there are several stocks of a single species in the same fishing ground.

The same applies to table III_C_6.

France

France wishes to see consideration given to the short timeframes in which it has been obliged to work in order to put in place this programme under new Regulation (EC) no. 199/2008.

Furthermore, France wishes to make use of the possibility, referred to in the guidelines, of providing the Commission with a new version of the national programme prior to review by SGRN, if there were to be a need to make corrections to the programme. Naturally, any such changes would go hand in hand with the relevant financial changes.

This is so because the change in the scope of application of the Regulation and collection of the data leads to a need to change the partners from those under the previous regulation, and to do so very rapidly. It is possible that modifications may still be made between now and the end of 2010 with regard to the partners assisting us in collecting the data, which will lead France to submit a new version of its national programme very shortly thereafter.

Given the extension of the scope of application of the Regulation, France has decided to reinforce its centralised expert and technical capability (there being numerous partners in France). To accomplish this, the scientific affairs mission, comprising experts and database developers, has recently been set up in the Ministry of Agriculture and Fisheries, the purpose of which is to contribute part of the technical work under this Regulation (website, some of the scientific analysis, etc.).

Certain general principles that have been adopted in presenting the Finforms could be described in a separate document, as an addendum to these financial forms.

Ireland

Ireland notes a number of changes and modifications to the list of standard tables. While we welcome developments to the national programme that aid data transparency and compatibility between member states, Ireland notes that some of these changes (from the 2009-2010) submission lack justification and have resulted in a substantial increase in workload i.e. re-analysis of national sampling allocations that we consider unnecessary and without foundation. Table IIIC1 now explicitly specifies a list of 'fishing' grounds into which national metiers must be allocated. While this may be useful post hoc to ensure that there has been adequate sampling coverage across stocks, many Irish metiers are trans-boundary. We consider that the metier should be defined from its area of operation, and not constrained to a potentially artificial boundary. This constraint led to another layer of metier analysis that we consider unnecessary. While we acknowledge the benefit of using a sampling frame at a national level (table IIIC3), due to the highly mobile nature of

Irish fisheries and their trans-boundary nature, the data frames are not always consistent with the activity of the various fleets and shifting the sampling target from 'fishing ground' to 'sampling frame' is not necessarily consistent with the activity that we wish to observe. Ireland notes that some of these changes are inconsistent with the historic national sampling strategy that has been developed over time and we felt best matches the activity of Irish fishing activity. SGRN reviewed the schedule of meetings carried out in 2010 (so far). SGRN expressed concerns on the scheduling of many DCF related meetings during the first part of 2010. The first 6 months of 2010 has been very busy for the DCF community. MS compiled new NP for 2011 to 2013 under new Guidelines by 31st March and the 2009 Technical Report by 31st May. The RCM meetings were conducted over the period April/May which gave little time for the preparation and circulation of reports to MS for Revision of their NP by 31st May. The LM meeting was held in early June and some RCM reports were not available for consideration by the meeting. SGRN 10-01 (Review of NP) took place two weeks before SGRN 10-02 (Review of Technical Reports). SGRN recommends that meeting scheduling on DCF related issues should be optimally spaced during the year to allow for the timely production of the relevant reports and follow up action by MS and other groups.

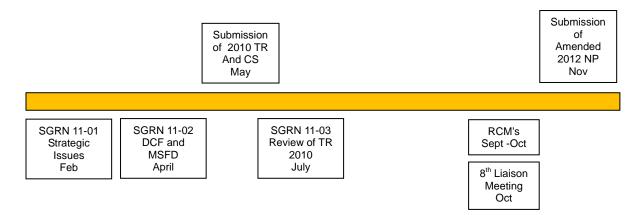
SGRN Priority Issues for 2010

- Review of National Programmes 2011 2013
- Review of Revised NP 2011?
- Review of Technical Reports (Now Referred to as Annual Reports) 2009
- Review of Research Surveys
- Regional Data Bases
- Data Deficiencies

SGRN Priority Issues for 2011

- SGRN Strategic Meeting early 2011
- Review of Revised NP 2012?
- Review of Annual Technical Reports 2010
- The DCF and the MSFD
- Review of Guidelines for Submission of NP
- Guidelines for the Evaluation of NP

These priorities and the schedule will be finalised with the Commission in early 2011.



SECTION 9 References

(Note that some references which are specific to certain issues discussed in this report are cited in the specific sections of the report to which they relate.)

Legal documents

- Council Regulation (EC) No 199/2008 of 25 February 2008 concerning the establishment of a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy
- Commission Regulation (EC) No 665/2008 of 14 July 2008 laying down detailed rules for the application of Council Regulation (EC) No 199/2008 concerning the establishment of a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy
- 2008/949/EC Commission Decision of 6 November 2008 adopting a multiannual Community programme pursuant to Council Regulation (EC) No 199/2008 establishing a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the common fisheries policy

Reports of Sub-groups

- Commission Staff Working Paper SGRN 07-01 Review of the list of surveys at sea (Appendix XIV of EU Commission Regulation N° 1581/2004)
- Commission Staff Working Paper <u>SGRN/ECA-09-01 (SGRN-08-03)</u>: Evaluation of Data Collection <u>programmes</u>
- Commission Staff Working Paper <u>SGECA-09-02</u> : Quality aspects of the collection of economic <u>data</u>
- Commission Staff Working Paper SGRN/ECA 09-03: Review of National Programmes and Technical Reports Guidelines for the DCF.
- Commission Staff Working Paper PLENARY MEETING REPORT OF THE SCIENTIFIC, TECHNICALANDECONOMIC COMMITTEE FOR FISHERIES (PLEN-09-03)

Other documents

Report of the Regional Co-ordination Meeting for Baltic Sea, 2010. Vilnius, Lithuania, 10th to 14th May 2010

Report of the Regional Co-ordination Meeting for the North Sea & East Arctic, 2010. Copenhagen, Denmark, 17th to 21st May 2010.

Report of the Regional Co-ordination Meeting for North East Atlantic area, 2009. Ostend, Belgium, 19th to 22nd April and 31st May to 2nd June 2010

Report of the Regional Co-ordination Meeting for the Mediterranean and Black Sea area, 2010. Varna, Bulgaria, 17th to 21st May 2010.

Report of the Regional Co-ordination Meeting for Long Distance Fisheries 2010. Madrid, Spain,

3rd to 5th March 2010.

- Report of the 2nd Liaison Meeting between the Chairs of the RCMs, the Chair of SGRN and the European Commission Brussels, 6-7 February 2006, 37 pp.
- Report of the 6th Regional Coordination Meeting for the Mediterranean and Black seas (RCM Med & BS) 2009 Venice, Italy, 13 to 16 October 2009, 155 pp.
- Report of the 5th Liaison Meeting between the Chairs of the RCMs, the chair of ICES PGCCDBS, the chair of PGMED, the ICES representative, the Chair of SGRN and the European Commission, Brussels, 26-27 February 2009, 42 pp.
- Report of the 6th Liaison Meeting between the Chairs of the RCMs, the Chair of SGRN, Hamburg, Germany, December 2009.
- Draft Report of the 7th Liaison Meeting between the Chairs of the RCMs, the chair of ICES PGCCDBS, the chair of PGMED, the ICES representative, the Chair of SGRN and the European Commission, Ostend, Belgium, 3rd and 4th June 2010. 67 pp.

Regional scenarios and roadmap on Regional Database: A report compiled at the regional workshop, Brussels 22-24 February 2010. (REF MARE REG/C3(2010)D/638)

STECF – SGRN 10- 01 Meeting

Monday 14th June to Saturday 19th June 2010 ISPRA, Italy

Terms of Reference

(Draft Version 3)

1. Evaluation of 2011 and 2013 National Programmes.

To evaluate the 2011 to 2013 National Programmes submitted under the new Data Collection Framework (Council Regulation (EC) 199/2008) using the new Guidelines and Procedures developed in SGRN 09-03. The evaluation will be based on the overarching criteria of conformity and scientific relevance. The subgroup will also consider the performance of the new guidelines for submission of NPs and, where necessary, make appropriate recommendations for their improvement.

2. Response by MS to the call for economic data launched to produce the draft report on the "Economic Performance of EU Fishing Fleet: Annual Report 2010 " To evaluate the situation regarding the response by MS to the call for economic data launched to produce the draft report on the "Economic Performance of EU Fishing Fleet: Annual Report 2010 " Data failures will be clearly stressed by the group in order to allow the Commission to enforce MS obligations on a clear basis.

3. Comments made by STECF

To review the comments made by of STECF during the April 2010 Plenary in relation to the work of SGRN ,

In particular on the following issues will be addressed;

- Data Deficiencies To present the state of play of user's feed back and develop a template and procedure for reporting data deficiencies by data user groups (e.g. STECF) and with particular emphasis on ICES expert groups.
- Review of Research Surveys To examine the current status of preparations for the review of research surveys to be carried out in October 2010.
- Marine Strategy Framework Directive. To address the collection of data under the DCF framework that relates to the Marine Strategy Framework Directive.

4 Comments made by 7th LM

To review the comments and action points made by the 2010 RCM's and the 7th Liasion Meeting in order to ensure that these recommendations are followed up

5. Regional Data Bases

To review progress on the development of regional databases following the RDB Workshop and discussions at the RCM and LM.

Scientific and Technical Committee for Fisheries (STECF) Sub Group on Research Needs (SGRN)

Evaluation of the DCF National Programmes for 2011-2013 and other DCF related issues (SGRN 10-01).

Hotel Casa Don Guanella, Ispra, Italy Monday 14th to Saturday 19th June 2010

AGENDA

(Version 2)

MONDAY 14th JUNE – DAY 1

14.00 Groups?	FOUNDATION FOR THE MEETING – ADDRESSING TOR 1 Introduction and Welcome Tour de Table Objectives and TOR's of SGRN 10-01 Logistics of Meeting Adoption of the Agenda Plenary/Sub Group Working Procedures Formation of Area Based Sub Groups – Allocation of Participants Meeting Room Allocations Appointment of Sub Group Raporteurs What NP do the Sub Groups deal with ? - Discussion Do the Economists work as Economic Sub Group or within the Area Reviewing the National Programmes – Ensuring a Consistent Approach Evaluation of National Programmes - Implementing the New Guidelines (15 Minute Presentation by Joel Vingeau) Discussions and Questions
15.30	Monitoring the performance of the New Guidelines in the Evaluations Report Structure Report Timelines and STECF Comments from the Commission COFFEE
16.00	COMMENTS FROM THE 7 th LIAISON MEETING OF RELEVANCE TO SGRN 10-01 ADDRESSING TOR 7
17.00	SUB GROUP MEETINGS START
18.00	CLOSE DAY 1

TUESDAY 15th JUNE – DAY 2

- 09.00 SUB GROUP MEETINGS
- 13.00 LUNCH
- 14.00 SUB GROUP MEETINGS
- 17.00 PLENARY SHORT REPORT FROM RAPPORTEURS Review of Issues – Are Evaluations on Track ? Format of the Evaluation Report Are Sub Groups Working ?
- 18.00 CLOSE OF DAY 2

19.00 - SOCIAL EVENING Brazilian Restaurant

WEDNESDAY 16th JUNE – DAY 3

- 09.00 SUB GROUP MEETINGS
- 11.00 COFFEE
- 11.30 PLENARY NORTH ATLANTIC SUB GROUP – Rapporteur (2 NP's) BALTIC SUB GROUP – Rapporteur (2 NP's) NORTH SEA SUB GROUP – Rapporteur (2 NP) (15 Minutes per Country)
- 13.00 LUNCH
- 14.00 PLENARY MED AND BS SUB GROUP – Rapporteur (2NP) ECONOMIC ISSIES – Rapporteur (15 minutes per Country – Economists 30 Minutes)
- 15.00 PLENARY REVIEW OF EMERGING ISSUES AND APPROACH TO EVALUATONS
- 16.00 SUB GROUP WORK CONTINUES
- 18.00 CLOSE OF DAY 3

THURSDAY 17th JUNE – DAY 4

09.00 PLENARY

NORTH ATLANTIC SUB GROUP – Rapporteur (3 NP's) BALTIC SUB GROUP – Rapporteur (3 NP's) NORTH SEA SUB GROUP – Rapporteur (3 NP's) (15 Minutes Maximum per Country)

11.15 COFFEE

11.30 PLENARY

MED AND BS SUB GROUP – Rapporteur (3 NP's) ECONOMIC ISSIES – Rapporteur (15 Minutes Maximum per Country; Economists Max 15 minutes)

12.30 PLENARY

Review of Evaluations – Next Steps Any Adjustments Required to Sub Groups?

13.00 LUNCH

14.00 PLENARY – ADDRESSING TOR's 2, 3, 4, 5, 6, (20 mins maximum per discussion)

Appointment of Rapporteurs for each TOR

TOR 3 - Review of Surveys (Status and Any Decisions Required) TOR 5- Regional Data Bases (Status and Any Decisions Required) TOR 6 -Comments to SGRN from STECF Plenary in April 2010 TOR 2- Economic Issues – AER data failures TOR 4 -Reporting Data Deficiencies by data end users – Developing a

Template

Summary of SGRN Recommendations

16.00 COFFEE

16.15 PLENARY THE DCF AND THE MARINE STRATEGY – Addressing TOR 8 Collection of Data under the DCF related to the MSFD SGRN Recommendations

17.15 PLENARY

RECAP – Review of Meeting Status Plan for Friday and Saturday – Do we need to Adjust?

PLENARY EMERGING RECOMMENDATIONS FROM MEETING Review of Text

18.15 CLOSE OF DAY 4

FRIDAY 18th JUNE – DAY 5

- 09.00 SUB GROUP MEETING Finish NP evaluations
- 13.00 LUNCH
- 14.00 PLENARY FINAL PRERSENTATION OF NP's NORTH ATLANTIC SUB GROUP – Rapporteur (3 NP's) BALTIC SUB GROUP – Rapporteur (3 NP's) NORTH SEA SUB GROUP – Rapporteur (3 NP's) (15 Minutes Maximum per Country)

16.15 COFFEE

16.30 PLENARY MED AND BS SUB GROUP – Rapporteur (3 NP's) ECONOMIC ISSIES – Rapporteur (15 Minutes Maximum per Country; Economists Max 15 minutes)

- **17.30** Status of NP Evaluations Review Dealing with Outstanding Issues
- 18.00 CLOSE DAY 5

SATURDAY 19th JUNE – DAY 6

- 09.00 PLENARY REVIEW OF MEETING Final Comments from Commission (we have to leave by 11h00)
- 09.30 REVIEW OF MEETING TOR's Have we addressed our TOR's ? Any Outstanding Jobs that Need to be Done ?
- 11h00 COFFEE
- 11h15 PLENARY REVIEW OF MAIN RECOMMENDATIONS Final Look at Text
- 12.30 MEETING REPORT STATUS Presentation to July STECF Remaining 2010 SGRN Meetings AOB
- 13.00 SGRN 10-01 MEETING CLOSE

Contact Details for Participants

Independent Experts;

Angeles Armesto **Rickard Bengtsberg** Paolo Carpentieri Paul Connolly (Chair) Henrik Degel Mark Dimech Michael Ebeling Ryszard Grzebielec Georas Kornilovs Emmanuil Koutrakis Ari Leskela Enrico Longoni Helen McCormick Arina Motova Vogg Lowe Nielsen Gheorghe Radu Tiit Raid Katja Ringdahl **Evelina Carmen Sabatella Els Torreele** Frans Van Beek Joel Vigneau Lucia Zarauz

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Evaluation TEMPLATE FORM filled in for each Member State

MEMBER STATE : XXXXX PART 1 – GENERAL COMMENTS OF SGRN ON NP

QUESTIONS	Yes/Mostly/Partly/No
From Article 4 Council Regulation 199/2008	
1 Was the NP drawn up in accordance with the	
Community Programme ?	
2 Did the NP include a multiannual sampling programme ?	
3 Did the NP include a scheme for at sea monitoring of	
commercial and recreational fisheries where necessary ?	
4 Did the NP include a scheme of research surveys at	
sea?	
5 Did the NP include a scheme for the management and	
use of the data for scientific analyses purposes?	
From Article 5 Council Regulation 199/2008	
6 Did the MS co-ordinate their NP with other MS in the	
same marine region and did the MS make every effort to	
co-ordinate their actions with third countries having	
sovereignty or jurisdiction over	
Waters in the same marine regions.	
7 Did MS take into account the recommendations made	
by RCM's	
From SGRN 09-03 Guidelines	
8 Did MS follow the SGRN 09-03 Guidelines ?	
9 Did the NP allow SGRN to evaluate what is planned by	
the MS ?	
10 Overall Comments by SGRN on NP	
(a)	
(b)	
(C)	
(d)	

PART 2 – SPECIFIC COMMENTS BY SGRN ON NP

SECTION - MODULE	MAJOR SGRN COMMENT
I General Framework	
II Organisation of NP	
III Module on the Evaluation of the Fishing Sector	
III.A General Description of the Fishing Sector	
III.B Economic Variables	
III.B.1 Data Acquisition	
III.B.2 Estimation	
III.B.3 Data Quality Evaluation	
III.B.4 Data Presentation	
III.B.5 Regional Co-ordination	
III.B.6 Derogations and Non Conformities	
III.C Biological – Metier Related Variables	
III.C.1 Data Acquisition	
III.C.2 Estimation Procedure	
III.C.3 Data Quality evaluation	
III.C.4 Data Presentation	
III.C.5 Regional Co-ordination	

III.C.6 Derogation and Non Conformities	
III.D Biological – Recreational Fisheries	
III.D.1 Data Acquisition	
III.D.2 Estimation Procedures	
III.D.3 Data Quality Evaluation	
III.D.4 Data Presentation	
III.D.5 Regional Co-ordination	
III.D.6 Derogations and Non Conformities	
III.E Biological – Stock Related Variables	
III.E.1 Data Aquisition	
III.E.2 Estimation Procedures	
III.E.3 Data Quality Evaluation	
III.E.4 Regional Co-ordination	
III.E.5 Derogations and Non Conformities	
III.F Transversal Variables	
III.F.1 Capacity	
III.F.2 Effort	
III.F.3 Landings	

III.G Research Surveys at Sea	
III.G.1 Planned Surveys	
III.G.2 Modification in the Surveys	
III.G.3 Data Presentation	
III.G.4 Regional Co-ordination	
III.G.5 Derogation and Non Conformities	
IV Module of the Evaluation of the Economic situation of Aquaculture and Processing Industry	
IV.A Collection of data Concerning Aquaculture	
IV.A.1 General Description of the Aquaculture Sector	
IV.A.2 Data Aquisition	
IV.A.3 Estimation	
IV.A.4 Data quality	
IV.A.5 Presentation	
IV.A.6 Regional Co-ordination	
IV.A.7 derogation and Non Conformities	
IV.B collection of data Concerning the Processing Industry	

IV.B.1 Data Acquisition	
IV.B.2 Estimation	
IV.B.3 Data Quality Evaluation	
IV.B.4 Data Presentation	
IV.B.5 Regional Co-ordination	
IV.B.6 Derogation and Non Conformioties	
V Module for the Evaluation of the effects of the fishing sector on marine ecosystems	
VI Module for the Management and Use of Data	
VII Follow up of STECF Recommendations	
VIII List of Derogations	
IX List of Acronyms and Abbreviations	
X Comments, Suggestions and Reflections	
XI References	
XII Annexes	

Questions used in the Evaluation (Based on SGRN 09-03)

I –	Gen	eral framework			
			Is the general framework clearly outlined?		
II	Orga	Organisation of the National Programme			
	Α	National organisat	tion and coordination		
	_		Are the partners, involved in the data collection domain of expertise, well described?		
	В	International coor			
			Is table II.B.1 completed? Is international coordination well identified?		
	С	Regional coordina			
	•				
			Is participatation in relevant RCM well identified?		
Ш	Mod	ule of the evaluation	n of the fishing sector		
	Α	General description	on of the fishing sector		
			Is table III.A.1 completed?		
			Does the fishing sector of the MS completely listed?		
	В	Economic variable			
			Table 3.B.1 filled in properly?		
			Table 3.B.2 filled in properly?		
			Table 3.B.3 filled in properly?		
		SUPRA REGION X			
		1 Data ac (a)	a quisition Definition of variables		
		(a)	Capital value		
			Value of quota and fishing right		
			FTE		
			Fuel efficiency of fish capture		
			Others?		
		(b)	Type of data collection		
			Types in line with guidelines?		
		(c)	Target and frame population		
			Is population in the Table 3.B.1 the same as in the Fleet register		
			at the 1 of January? Allocation of vessels to the segments?		
			Allocation of vessels to the supraregion?		
			Clustering?		
		(d)	Data sources		
			List and description of data sources used?		
			Is there information how the consistency of data coming from		
			different data sources will be ensured?		
			Questionnaire provided?		
		(e)	Sampling stratification and allocation scheme		
			Type of sampling strategy?		
			Description of selection of sampling units?		
			Further stratification within fleet segment ?		

If further stratification is used is there information about how the stratification been made? Determination of sample size for each fleet segment Is there information about targets used to determine the sample size? Why they been chosen? Sample evolution over time, rotational groups Description of rotation if it is used Description of changes in sample size over the time

2 Estimation

Does methodology to derive final estimates from data collected presented for each variable? Does the method how MS is going to estimate variables in the case of census and non-response described?

3 Data quality evaluation

Does methods to assess the variability of the estimates and bias explained well? Does the method used for assessing the quality of the data acceptable? Formulas presented?

4 Data presentation

When the data will be available? Reference year? Confidentiality problems?

5 Regional and international coordination

Is there a list of RCM recommendations with brief description and responsive actions in NP? List complete?

6 Derogations and non conformities

Are derogations explained and justified?

C Biological metier related variables

REGION XX

Table 3.C.1 filled in comprehensively? Table 3.C.2 filled in comprehensively? Table 3.C.3 filled in comprehensively? Table 3.C.4 filled in comprehensively? Table 3.C.5 filled in comprehensively?

1 Data acquisition

(a)

- Codification and naming convention Following RCM recommendations fishing ground - mesh size range - métiercode - assignement procedure?
- (b) Selection of metiers to sample Is the selection of the metiers well described?
- (c) Type of data collection Is the type of data collection well/comprehensive described?
- (d) Target and frame population Is the entire population covered (incl. small scale fisheries)?

(e) Sampling stratification and allocation scheme

Are merging of métiers done according to the RCM recommendations? Is sampling protocol well described? Is sampling plan specified with a precision objective? And if not is a minimum objective specified? Is national stratification in line with the DCF?

2 Estimation procedures

Are the methods described comprehensively?

3 Data quality evaluation

Are the methods described comprehensively? Are potential sources of bias well identified?

4 Data presentation

Does the NP gives an acceptable time-lag when data are available to end-users?

5 Regional and international coordination

Has the MS taken steps to coordinate the sampling programme with countries of the same marine region? Is there a list of RCM recommendations with brief description and responsive actions in NP?

6 Derogations and non conformities

Are the derogations demanded and non-conformities listed, and do SGRN consider them fully justified?

Biological recreational fisheries

D

1 Data acquisition

Are all species required by DCF (in App. IV) well covered ?

- (a) Type of data collection Is the type of data collection well/comprehensively described?
- (b) Target and frame population Are target and frame population well described? Are target and frame population matching?
- (c) Data sources Is there a comprehensive description of the data sources?
- (d) Sampling stratification and allocation scheme
 Is sampling protocol well described?
 Is the chronology of work outlined (including pilot studies) in line
 with the DCF?

2 Estimation procedures

Are the methods described comprehensively?

3 Data quality evaluation

Are the methods described comprehensively? Are potential sources of bias well identified?

4 Data presentation

Does the NP gives an acceptable time-lag when data are available to end-users?

5 Regional and international coordination

Has the MS taken steps to coordinate the sampling programme with countries of the same marine region? Is there a list of RCM recommendations with brief description and responsive actions in NP?

6 Derogations and non conformities

Are the derogations demanded and non-conformities listed, and do SGRN consider them fully justified?

E Biological stock-related variable

Table 3.E.1 filled in comprehensively? Table 3.E.2 filled in comprehensively? Table 3.E.3 filled in comprehensively?

Data acquisition

- 1
- (a) Selection of stocks to sample Is the distinction between stocks sampled and not sampled clear?
- (b) Type of data collection Is the type of data collection well/comprehensively described?
- (c) Target and frame population

Are target and frame population well described? Are target and frame population matching?

(d) Sampling stratification and allocation scheme

Is sampling protocol well described?

Is sampling plan specified with a precision objective? And if not is a minimum objective specified?

2 Estimation procedures

Are the methods described comprehensively?

3 Data quality evaluation

Are the methods described comprehensively? Are potential sources of bias well identified?

4 Data presentation

Does the NP gives an acceptable time-lag when data are available to end-users?

5 Regional and international coordination

Has the MS taken steps to coordinate the sampling programme with countries of the same marine region? Is there a list of RCM recommendations with brief description and responsive actions in NP?

6 Derogations and non conformities

Are the derogations demanded and non-conformities listed, and do SGRN consider them fully justified?

F Transversal variables

- 1 Capacity
 - 1 Data acquisition?
 - 2 Data quality evaluation?

2 Effort

1 Data acquisition

Is all the population covered (incl. < 10m.)? Is sampling protocol well described? Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...) Are the protocols and methods used well described ?

Are sources of information in line with the quality requirements? Is national stratification in line with the DCR?

- 2 Data quality evaluation Is the method used for assessing the quality of the data acceptable?
- 3 Data presentation
 - Regional and international coordination Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?
- 5 Derogations and non conformities List the derogations demanded and comment on their justification?.

3 Landings

4

1 Data acquisition

Is all the population covered (incl. < 10m.)?

Is sampling protocol well described?

Is sampling plan leading to some sort of bias? (e.g. non proportionality, ...)

Are the protocols and methods used well described ?

Are sources of information in line with the quality requirements? Is national stratification in line with the DCR?

- 2 Data quality evaluation Is the method used for assessing the quality of the data acceptable?
- 3 Data presentation
- 4 Regional and international coordination Are there initiatives taken to coordinate the sampling programme with countries of the same marine region?
- 5 Derogations and non conformities Are the derogations demanded and non-conformities listed and explained?

G Research surveys at sea

1 Planned surveys

Is Table III.G.1 completed?

Correspondence of the surveys with the DCF, both in terms of technicalities and naming convention Is there a brief overview of the surveys? Is there a map of the surveys?

2 *Modifications in the surveys*

Comment on the modifications demanded?

3 Data presentation

Will data be made available to end-users in due-time?

4 Regional and international coordination

Are the surveys internationally coordinated? Does the MS follow the agreed international protocols? Are all data accessible in international database?

5 Derogations and non conformities

Are the derogations demanded and non-conformities listed, and do SGRN consider them fully justified?

IV Module of the evaluation of the economic situation of the aquaculture and the processing industry

A Collection of economic data for the aquaculture

Does Table IV.A.1 filled in properly? Does Table IV.A.2 filled in properly? Does Table IV.A.3 filled in properly?

General description of the sector

Does sector of the MS completely listed?

1 Data acquisition

- (a) Definition of variables Are the variables collected well documented?
- (b) Type of data collection Types in line with guidelines?
- (c) Target and frame population Is all the population covered ?
- (d) Data sources Are the sources of information consistent with the coverage of the population/ not introducing bias?
- (e) Sampling frame and allocation scheme Is sampling protocol well described, including the allocation of enterprises within segments, and the concordance of the segments with the Regulation ?
- 2 Estimation
- Are methods to raise the final estimates well documented?

3 Data quality evaluation

Is the method used for assessing the quality of the data acceptable?

Does methods to assess the variability of the estimates and bias explained well? Formulas presented?

4 Data presentation

When the data will be available? Reference year? Confidentiality problems?

5 Regional and international coordination

Is there a list of RCM recommendations with brief description and responsive actions in NP? List complete?

6 Derogations and non conformities Are derogations explained and justified?

B Collection of data concerning the processing industry

Does Table IV.B.1 filled in properly? Does Table IV.B.2 filled in properly?

- 1 Data acquisition
 - (a) Definition of variables
 - (b) Type of data collection

Types in line with guidelines?

- (c) Target and frame population
- (d) Data sources

List and description of data sources used? Is there information how the consistency of data coming from different data sources will be ensured? Questionnaire provided?

- (e) Sampling frame and allocation scheme
- 2 Estimation

4

Does methodology to derive final estimates from data collected presented for each variable? Does the method how MS is going to estimate variables in the case of census and non-response described?

3 Data quality evaluation

Does methods to assess the variability of the estimates and bias explained well?

Does the method used for assessing the quality of the data acceptable?

Formulas presented?

Data presentation When the data will be available? Reference year? Confidentiality problems?

5 Regional and international coordination

		Is there a list of RCM recommendations with brief description and responsive actions in NP? List complete?
	6 Derogations and no	n conformities Are derogations explained and justified?
v	Module of the evaluation of effects	of the fishing sector on the marine ecosystem Table V.1 filled in comprehensively?
		Does the MS made the necessary adjustments to account for the ecosystem approach in term of o Survey protocol o Availability of VMS information to relevant end-users o Calculation of discards rates per metiers o Fuel consumption estimates
VI	Module for management and use o	f the data
	A Management	Is there a description of the storage database system?
	B Use of the data	Is it clear how the quality control and validation process of the primary and aggregated data are made?
		Is MS planning to participate at known relevant meetings?
VII	Follow-up STECF recommendation	S
VIII	List of derogations	Is there a list of STECF recommendations with brief description and responsive actions in NP?
VIII	List of derogations	Is there a history of derogations, together with the reference with the NP year it was given?
		Is there a complete list of derogations sought in the current NP proposal?
IX	List of acronyms and abbreviations	s Present?
хі	comments, suggestions and reflec	tions
		Is there any issue raised that needs to be addressed by SGRN?
XI	References	Present?
XII	Annexes	Are annexes concise and essential in understanding the NP proposal?

Extract (Pages 13 to 16). from the 34th plenary Meeting of STECF (PLEN-10-02)relating to the review of SGRN 10-01

4.2. SGRN 10-01: Evaluation of 2011-2013 National Programmes linked to the Data Collection Framework

STECF is requested to review the report of the **SGRN-10-01** Working Group of June 14 - 19, 2010 (Ispra, Barza) meeting, evaluate the findings and make any appropriate comments and recommendations.

The terms of reference for the SGRN-10-01 Working Group are to be found in Annex II.

STECF comments

STECF notes the tremendous efforts made by MS in compiling their multi-annual NP (2011 –2013) in accordance with the new Guidelines (SGRN 09-03). STECF notes that MS have mostly complied with the new guidelines. Many issues identified can be addressed in the review of the guidelines scheduled for 2011. In general, the National Programmes (NP) were well laid out, especially the content index. STECF also appreciates that MS provided the NP proposal in English.

STECF shares the working group concern that no progress has been made in developing a clear and digitally-based evaluation process that includes a pre-screening of National Programmes and Technical Reports (TR) (see discussion SGRN 09-01). Specific guidelines on how to evaluate the new NP and TR are needed. STECF notes that SGRN developed proposed guidelines and procedures at the SGRN 10-01 and SGRN 10-02 meetings and recommends that they be formalised and finalised in 2011. STECF stresses the importance of a pre-screening of NP's and TR's to make future meetings as efficient as possible. STECF stresses the need to develop a simple electronic version of the evaluation procedure that can produce the required tables and summary information automatically as achieved by its SGMED WG. STECF considers that this issue should be reviewed as part of the SGRN Strategic discussions in early 2011.

SGRN was asked by STECF (April 2010 Plenary) to address the proposed collection of data under the Marine Strategy Framework Directive (MSFD). STECF notes that data collected under the DCF framework, particularly under the scheme for research surveys at sea (Council Regulation 199/2008), can be used to inform on indicators relating to some of the descriptors in Annex 1 of the MSFD. STECF would point out that the review of DCF surveys scheduled for October 2010 will address ecosystem indicators, but not specifically in relation to the MSFD.

STECF welcomed the work of SGRN in relation to the Regional Database (RDB) issue and noted the progress made over the last year. STECF notes that the RDB meeting proposed by SGRN 09-04 took place in Brussels in February 2010 and that the various Regional Coordination Meetings (RCM's) have reviewed and commented on this report during their April-May 2010 meetings. STECF notes that the RCM Baltic agreed to use FishFrame as a

RDB. The North Sea & Eastern Arctic RCM has agreed to use a disaggregated RDB. The Mediterranean & Black Sea RCM considers that a RDB is not necessary. STECF

disagrees with the RCM view and in line with its general support for RDBs, considers that a RDB for the Mediterranean & Black Sea is highly desirable. The Long distance fishery RCM noted that databases are available from ICCAT and other relevant RFMO's. STECF notes that while such databases exist, they are not always readily accessible. STECF supports the proposal for a RDB Steering Group and notes that the first meeting is schedule to take place in late 2010.

STECF notes the large number of DCF-related meetings and deadlines over the first 7 months of 2010. The first 7 months of 2010 were very busy for the DCF community. STECF recommends that meeting scheduling should be optimally spaced during the year to allow for the timely production of the relevant reports and to allow time for follow-up action by MS and other groups.

STECF recommendations

In order to further explore how data collected under the DCF can assist an ecosystem approach to Fisheries management (EAFM) which falls under the CFP and how such data relate to the implementation of the MSFD, STECF suggests the Commission could include this topic in the STECF work program 2011, preferably in early 2011. Participants of such an STECF working group meeting should consist of a mix of MSFD and DCF experts. STECF suggests the following Terms of Reference for this working group:

(1) to examine the descriptors listed in Annex 1 of the MSFD with their associated indicators and data requirements in relation to data from DCF research vessel surveys.

(2) to consult the Commission Decision on MSFD (published in summer 2011), the MSFD Management and Task Group reports1, and the review paper published in Marine Policy in 2010 on the links between the CFP and MSFD 2

(3) to examine how the current data collected under the DCF could be used to provide information on the indicators for the MSFD descriptors as defined by the MSFD Task Groups. The DCF data sets should be confined to those generated from at sea surveys.
(4) to examine if new data sets could be collected under the DCF and used to provide information on the indicators defined for the MSFD descriptors. The proposed new data sets should be confined to those generated rom at sea surveys under the DCF.

STECF considers strategic planning to be a very important element of the SGRN work programme. STECF notes that SGRN meetings are generally devoted to evaluation of National Programmes and review of Technical Reports (now Annual Reports). This is a large workload and leaves little time to deal with strategic issues and planning. As there will be no major review of NP in 2011, STECF recommends that a SGRN working group be convened early in 2011 to discuss strategic issues over the medium to long term (next five years). The issues relate to data deficiencies, revisions to Guidelines for submission of National Programmes and Annual reports; procedures for evaluation of NP and AR, revisions to the DCF; actions required following the review of surveys; the DCF and the Control Regulation; Regional Database issues; DCF Website; DCF Sharepoint. As concerns the DCF and the Control Regulation, there is no co-ordination at the EU level and in many cases not on the MS level either. STECF suggests that the ToRs for this meeting be developed in conjunction with the Commission in late 2010.

The working group recommends a working group, possibly followed up by a Study on identifying adequate methods for allocating economic data at different disaggregation levels (e.g. metiers). STECF agrees that there are significant difficulties in allocating

fishing costs to different métiers when individual vessels operate in multiple métiers during the year or even during one day at sea, and supports this recommendation.

REFERENCES SPECIFIC TO ANNEX 6

REF 1: Task Group 1 Report Biological Diversity - EUR 24337 EN, Task Group 2 Report Non-indigenous Species - EUR 24342 EN, Task Group 3 Report Commercially exploited fish and shellfish - EUR 24316 EN, Task Group 4 Report Food Webs - EUR 24343 EN, Task Group 5 Report Eutrophication - EUR 24338 EN, Task Group 6 Seafloor Integrity -24334 EN, Task Group 8 Report - Contaminants and Pollution Effects -EUR 24335 EN, Task Group 9 Report - Contaminants in Fish and Other Seafood - EUR 24339 EN, Task Group 10 Report - Marine Litter - EUR 24340 EN, Management Group Report - Scientific Support to the European Commission on the Marine Strategy Framework Directive - EUR 24336 EN.

Ref 2; Rätz H.J., Doerner H., Scott R. & Barbas T. (2010). Complementary roles of European and national institutions under the Common Fisheries Policy and the Marine Strategy Framework Directive. Marine Policy 34 (5):1028-1035.

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Abstract

Articles 6(1) and 7(2) of Council Regulation (EC) No 199/2008 state that the evaluation of both National Programme proposals and Annual Reports (AR) should be carried out by STECF. The main business of the meeting was to evaluate the National Programmes for 2011 to 2013 submitted by Member States. Twenty One Member State's National Programmes were evaluated by a group of 23 independent experts. No National Programme was received from Greece. STECF reviewed the report during its plenary meeting on 12-16 July 2010 in Copenhagen.

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The Scientific, Technical and Economic Committee for Fisheries (STECF) has been established by the European Commission. The STECF is being consulted at regular intervals on matters pertaining to the conservation and management of living aquatic resources, including biological, economic, environmental, social and technical considerations.



