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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

**on the implementation of Regulation (EC) No 1921/2006 on the submission of statistical
data on landings of fishery products in Member States**

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1. INTRODUCTION

Article 10 of Regulation (EC) No 1921/2006 of the European Parliament and of the Council¹ (the Landings Regulation) lays down the following requirement:

The Commission shall, by 19 January 2010 and every three years thereafter, submit an assessment report to the European Parliament and the Council on the statistical data compiled pursuant to this Regulation and in particular on their relevance and quality. The report shall also analyse the cost-effectiveness of the system used for the collection and processing of statistical data and shall put forward best practices for reducing the workload for Member States and enhancing the usefulness and quality of the statistical data.

This is the third assessment report that the Commission has submitted to the European Parliament and the Council. The first report was published as COM(2010) 675 final and the second as COM(2014) 240 final.

2. COVERAGE AND CONTENT

The Landings Regulation requires Member States and EEA countries to submit statistical data on an annual basis and within six months of the end of the reference calendar year. They are required to provide data on total quantities and unit values of the fishery products landed in their territory by EU and EFTA vessels. Data are to be broken down by: i) the flag state of the fishing vessels carrying out landings (as per the codes set out in Annex II to the Landings Regulation); ii) the ‘presentation’ of the products (Annex III of the Regulation); and iii) the intended use of the products (Annex IV to the Regulation).

This Report assesses the progress made by Member States and EFTA countries with respect to the provisions of the Landings Regulation, namely in terms of the completeness and quality of the data provided.

2.1. Data collection and sources

Administrative data appear to be the main source of statistics on landings with almost all countries collecting logbooks, sales notes, and landing, transshipment and takeover declarations. Council Regulation (EC) No 1224/2009² and Commission Implementing

¹ Regulation (EC) No 1921/2006 of the European Parliament and of the Council of 18 December 2006 on the submission of statistical data on landings of fishery products in Member States and repealing Council Regulation (EEC) No 1382/91 (OJ L 403/1, 30.12.2006, p. 1).

² Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No 847/96,

Regulation (EU) No 404/2011³ require the skippers of vessels over 10 m in length to keep a logbook of their operations and to submit the information they have recorded as soon as possible, and within 24 hours, even when there are no catches. Logbooks contain data recorded by skippers during their vessels' operations and must include an estimate of the live weight of the catch. They are particularly useful for attributing catches to fishing areas and calculating levels of fishing activity and allow cross-checking against other data sources. For vessels under 10 m, Member States use forms (e.g. catch reports and logbooks), sales notes or sampling techniques to monitor fishing activity.

Sales notes are submitted to the authorities responsible for the initial sale of the fish. They include information on the quantity of each species landed, the form in which the products are presented, the value of each product and the vessel making the landing.

The widespread use of electronic reporting has facilitated and improved data collection, as has having regulated submission deadlines. Data are being sent to the responsible institutions on time, and in most cases include all the information required. In addition to logbooks, sales notes and landing declarations, some countries also collect other information, for example via the vessel monitoring system (VMS), which allows fishing areas to be identified more accurately. As a result, full coverage of the fishing activity taking place in all fleet segments and fishing areas is ensured, as almost all countries are able to rely on administrative data sources to carry out a full census of activity.

In cases where the administrative information available is insufficient, surveys are used to supplement (France and Malta) or substitute (Greece and Italy) for administrative data. These cases are described in more detail in the following section.

2.2. Data collection systems in Member States and EFTA countries

Belgium — The Sea Fisheries Service, part of the Agriculture and Fisheries Policy Division, is responsible for data collection. Sales notes are the main source of information and are submitted electronically on the same day from the three main auctions (Zeebrugge, Ostend and Nieuwpoort). The exception to this is data on sales from small vessels, which are allowed to sell directly to the public at Ostend (rather than at the auction) but which are, however, required to report weights and prices to the Ostend auction. Logbooks are sent within 48 hours and are used to attribute the amounts sold and the fishing activity to the various fishing areas (the main areas being the North Sea and the Eastern Channel).

(EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006 (OJ L 343, 22.12.2009, p. 1).

³ Commission Implementing Regulation (EU) No 404/2011 of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy (OJ L 112/1, 30.4.2011, p. 1).

Bulgaria — The National Agency of Fisheries and Aquaculture is responsible for landings data. Data is gathered from administrative sources: any person engaged in commercial fishing is required to submit logbooks and landing declarations (even where the vessel is under 10 m); any person engaged in the first sale of fish is required to submit sales notes, from which price information is then derived. The logbooks and sales notes received by the National Agency of Fisheries and Aquaculture have to be entered in the system within 15 days of the data being submitted. Bulgarian vessels fish exclusively in the Black Sea.

Cyprus — The Department of Fisheries and Marine Research (part of the Ministry of Agriculture, Rural Development and Environment) is responsible for collecting data on catches and landings. Vessels of up to 10 m in length are required to submit sales receipts in addition to sales notes (for fishermen selling their landings directly) and landing declarations. Paper logbooks are collected for vessels between 10 m and 12 m, while vessels above 12 m are equipped with the VMS and use the associated electronic reporting system (ERS) to report sales notes. The various data sources are not currently linked and data is stored in different databases. There is a clear need for an integrated system, and thus for the technical assistance that would be required to develop such a system. Cypriot vessels operate in the Central and Eastern Mediterranean.

Denmark — The Danish AgriFish Agency, which sits within the Ministry of Environment and Food, is responsible for landings. First-hand buyers must be registered and must submit sales notes. Most of the major fish buyers submit their sales notes online on a daily basis. All Danish vessels are required to fill in logbooks (and vessels above 12 m must keep electronic logbooks). Vessels under 10 m may be exempted from keeping a logbook, provided fishermen have signed a “declaration on fishing area”. The ERS is fully implemented and vessels over 12 m are required to use the VMS. Danish vessels are mainly active in the North Sea. Data are taken from administrative sources, but are ‘frozen’, in agreement with the national statistical institute, before being compiled and sent to Eurostat.

Germany — Data on landings are the responsibility of the Federal Agency for Agriculture and Food. Data are from administrative sources and are collected via logbooks. Information on the quality, presentation and price of the products is obtained from landing declarations and sales notes. German vessels fish mainly in the western waters, the North Sea, the Baltic, Greenland and the Norwegian waters.

Estonia — The Ministry for Rural Affairs, the national statistical institute, the Ministry for the Environment and the Environmental Inspectorate are involved in data collection. The national statistical institute and the Ministry of Rural Affairs are responsible for editing and sending the data. Data are from administrative sources, including logbooks, landing declarations, sales notes and transshipment and transport documents. Vessels under 12 m, or under 15 m and exclusively operating in the Estonia territorial sea, fill in national paper logbooks. Vessels above 12 m are required to submit logbooks using the ERS. First-hand buyers of fish are required to submit sales notes electronically to the Ministry for Rural Affairs. Estonian vessels fish in the Baltic Sea, the Northwest Atlantic and inland waters.

Ireland — The Sea Fisheries Protection Authority is solely responsible for data on landings. Data on catches are taken from electronic logbooks for vessels above 10m and from sales notes for vessels under 10m. The Irish fleet is active in the Northeast Atlantic.

Greece — Administrative data on average landing prices and values are collected by the Ministry of Reconstruction of Production, Energy and Environment. They are sent to the national statistical institute for editing and processing. Data on catches are collected by the national statistical institute via a monthly statistical survey. The survey involves a full census of overseas fishing activity (vessels operating in the Eastern Central Atlantic) and a sample survey of the open sea and coastal fishing activity of vessels operating in the Mediterranean Sea. A method of one-stage stratified random sampling is used due to the very high non-response rate (50%). Catches from vessels with engines under 20 horsepower are not included. Data are sent to the Directorate-General for Maritime Affairs and Fisheries (DG MARE) by the Ministry of Reconstruction of Production, Energy and Environment and to Eurostat by the national statistical institute.

Spain — The Fisheries General Secretariat and the sub-Directorate General for Statistics (both part of the Ministry of Agriculture, Food and Environment) are responsible for data on landings. The Fisheries General Secretariat sends data to DG MARE, while the sub-Directorate General for Statistics sends data to Eurostat. Data are extracted from the 'Maritime fisheries catches and landings statistics'. This gathers information from landings and transshipment declarations (for vessels above 10m), first sales notes, total allowable catches (TACs) and quotas, and from producers' organisations. The data sent to DG MARE are purely administrative whereas those provided to Eurostat have already undergone some statistical processing. The Spanish fleet operates in all fishing areas covered by the EU Regulation, and in other regions.

France — The Directorate for Maritime Fisheries and Aquaculture has overall responsibility for data collection. The Statistical Bureau of Fisheries and Aquaculture, acting under the authority of the Directorate for Maritime Fisheries and Aquaculture, is responsible for editing and sending the data to the Commission. The national agency FranceAgriMer is responsible for compiling sales notes and entering paper declarations. Data on tropical tuna fisheries are supplied to the Directorate for Maritime Fisheries and Aquaculture by the Institute for Research and Development. Administrative sources (logbooks, landing declarations and sales notes and data from the VMS) provide good coverage of fishing activity in the Atlantic. Incomplete administrative data on the Mediterranean and the overseas territories are supplemented with data collected from sample surveys, but these data are not yet included in the data sent to Eurostat. France reported having encountered problems with missing or erroneous primary data and acknowledged the need to improve data quality. Almost 80 % of catches are made in the North-East Atlantic. The other main fishing areas are the West Indian Ocean, the Central-East Atlantic and the Mediterranean.

Croatia — The Fisheries Directorate in the Ministry of Agriculture is responsible for data on landings. Administrative data are collected from logbooks and landing declarations (for trawlers and purse seiners, and vessels above 10 m), catch reports (for vessels under 10 m), the VMS (for vessels above 15 m) and sales notes for fresh fish. Croatian vessels operate in the Northern and Central Adriatic Seas.

Italy — The Ministry of Agriculture, Food and Forestry policies, the National Research Council and ITAFISHSTAT (a national consortium for the development of fisheries statistics) are responsible for data on landings. The National Research Council and ITAFISHSTAT carry out a multivariate sample survey of fishing activity in the Mediterranean, the methodological aspects of which were set in conjunction with the national statistical institute. Vessels authorised to fish for bluefin tuna are excluded from the sample and report data to the Ministry of Agriculture, Food and Forestry policies using logbooks. Census data on fishing in the Eastern Central Atlantic and Western Indian Ocean previously provided by the national statistical institute are no longer being submitted. At the time of the previous report, Italy had proposed making changes to the method used for collecting these data, in order to overcome the problem of very low response rates. As yet, however, no changes have been made.

Latvia — The State Environment Service, which is part of the Ministry for environmental protection and regional development, is responsible for collecting data from landings and first sales notes and for aggregating data for the Baltic Sea and the Gulf of Riga. The Institute of Food Safety, Animal Health and the Environment is also involved in the collection and processing of data for these areas, and also for high-sea fisheries in the Atlantic. In addition, it provides the Department of Fisheries (within the Ministry of Agriculture) with the data for aggregation. Overall responsibility for data quality lies with the Central Statistical Bureau, with the State Environment Service and the Institute of Food Safety, Animal Health and the Environment also ensuring quality within their respective areas of competence. The Department of Fisheries is responsible for the final cross-checking of data and for submitting data to the Commission. Data are from administrative sources, including logbooks, sales notes and landing declarations. All fishing vessels above 12 m use the ERS and are equipped with the VMS. Data on catches by value and per species collected by the Central Statistical Bureau are cross-checked against the administrative data from the Department of Fisheries. The Latvian fishing fleet is active in the Baltic Sea and the North East and Eastern Central Atlantic.

Lithuania — The Fisheries Department in the Ministry of Agriculture is responsible for data collection. The main data sources are logbooks, sales notes and landing declarations. Lithuania uses an integrated automated system for processing and validating data on landings. Lithuanian vessels fish in the Northeast and Northwest Atlantic, Eastern Central Atlantic and South Pacific.

Malta — The Department of Fisheries and Aquaculture, which is part of the Ministry for Sustainable Development, Environment and Climate Change, is responsible for data collection. Data are sent to Eurostat by the national statistical institute and to DG MARE by the Department of Fisheries and Aquaculture. A census approach is used for vessels above 10 m, with data being collected using logbooks and sales vouchers. Data on vessels under 10 m is collected via a small-scale multivariate sampling survey. Maltese vessels are active in the Mediterranean Sea.

Netherlands — The Fisheries Department of the Netherlands Enterprise Agency is responsible for collecting data from the Netherlands Food and Consumer Product Safety Authority, and subsequently sends the required data to DG MARE. The national statistical institute is responsible for editing and submitting data to Eurostat. Logbooks, sales notes and

data on catches are obtained from the Fisheries Registration and Information System, which is maintained by the Consumer Product Safety Authority. Dutch vessels are active in the Northeast and Eastern Central Atlantic and Southeast Pacific.

Poland — The Fisheries Department in the Ministry of Agriculture and Rural Development is responsible for data collection. Data are obtained from electronic or paper logbooks and monthly paper reports (depending on the size of the vessel) and sales notes. Both the ERS and the VMS are in use, the former for vessels of over 12 m. Polish vessels are mainly active in the Baltic Sea and the Eastern Central and Southeast Atlantic.

Portugal — The national statistical institute has delegated responsibility for the production of official fisheries statistics to the Directorate-General for Natural Resources, Security and Maritime Services. The five regional directorates for agriculture and fisheries on the mainland and the competent institutions in the autonomous regions are also involved in data collection. Data are mostly taken from logbooks, landing declarations and, for fresh and refrigerated fish, from national auctions and sales notes. Portuguese vessels are mainly active in the Northeast, Western and Eastern Central Atlantic, but also in the Pacific.

Romania — The National Agency for Fisheries and Aquaculture is responsible for data collection. The National Institute for Marine Research and Development is also involved in data collection and cross-checking of data, and is co-responsible for submitting data to DG MARE. Data are from administrative sources (logbooks, sales notes and landing declarations). The VMS is used but the ERS has not yet been introduced. Data are collected by inspectors from the National Agency for Fisheries and Aquaculture and then cross-checked by the Inspection and Maritime Policy Directorate. Fishing vessels are active only in the part of the Black Sea under Romanian jurisdiction.

Slovenia — Responsibility for data collection is shared by the Ministry of Agriculture, Forestry and Food, the Fisheries Research Institute and the national statistical institute. Data is mainly from administrative sources. All vessels are required to complete logbooks and provide landing declarations. Data on prices are obtained from sales notes and survey questionnaires. Missing prices (which accounted for less than 1 % of the total landed quantities in 2014) are estimated. The Fisheries Research Institute manages data entry, processing and control, while the Ministry of Agriculture, Forestry and Food and the national statistical institute are responsible for the comparability of data over time, the punctuality of data publication, and the submission of data to international organisations. The Slovenian fleet operates in the Adriatic Sea.

Finland — The Natural Resources Institute is primarily responsible for fisheries data. The Ministry of Agriculture and Forestry keeps registers and a real time database on commercial marine fisheries and is responsible for monitoring quota species and submitting data on these to DG MARE. The Natural Resources Institute provides further data, in addition to the data provided by the Ministry of Agriculture and Forestry, from its own surveys and external information. It compiles these statistics and submits them to Eurostat. Vessels above 10m are required to submit logbooks whilst vessels under 10m complete monthly coastal fishery forms (with catches being estimated in cases of non-response). First-hand sales of quota species are regulated. Information on the sales of non-quota species is supplemented with a

survey of the largest fish wholesale companies. Finnish vessels fish exclusively in the Baltic Sea.

Sweden — The Swedish Agency for Marine and Water Management is responsible for data collection. Data are from administrative sources, including logbooks, sales notes, landing declarations, and, for the coastal fleet, monthly (or even daily) journals. Logbooks for fishing vessels above 12 m are submitted electronically via the ERS system. Sales notes are collected centrally either electronically or on paper and coastal fishermen can submit coastal journals electronically via a secure web interface.

United Kingdom — Authorities in the individual countries within the UK are responsible for data collection and quality checking. The Marine Management Organisation, the authority for England and Wales, then collates information from the other authorities and has ultimate responsibility for ensuring the quality of information before submitting the data to the Commission. Vessels above 10 m are required to provide electronic landing declarations, logbooks and sales notes, whilst vessels under 10 m provide log sheets and landing declarations on a voluntary basis. All sales notes, regardless of the size of the vessel, are required to be submitted to the authorities. They are supplemented by other sources of information (e.g. activity diaries to be submitted by vessels involved in shellfish fishing). The Northeast Atlantic is the UK's main fishing area but a small distant water fleet also operates in the Southwest Atlantic and the Western Indian Ocean.

Iceland — Data are collected by the Directorate of Fisheries and sent on a monthly basis to the national statistical institute, which processes and cleans the data before sending them on to Eurostat and DG MARE. All fish purchasers and processors are legally required to fill in weight and processing reports. Icelandic vessels fish predominantly in the Northeast Atlantic.

Norway — The Directorate of Fisheries is responsible for data on fisheries, but the information is initially collected by six sales organisations, which handle the economic transactions between fishermen and buyers. Data are from administrative sources (catch logbooks, landing declarations and sales notes). All fishing vessels above 15 m are required to submit electronic logbooks, as are vessels above 12 m fishing in the Skagerrak area. As an EEA country, Norway does not report using the ERS or the VMS, but it is using these systems for monitoring the quality of sales notes. Norwegian vessels fish in the Northeast and Northwest Atlantic, and in the Antarctic.

2.3. Data quality

The methods used for collecting information on fisheries are fairly consistent throughout Europe. Source data has been improved over recent years. The extensive use of electronic reporting has led to data being sent on time and being of better quality. The electronic data reports also allow built-in checks to be included and raw data to be verified. National authorities also carry out preliminary checks of this type when data are provided using paper logbooks (this being the case mainly for vessels under 10 m).

Some countries use additional tools to verify the plausibility of the information reported by fishermen. The Portuguese authorities carry out inspections, either at sea or during landings at ports. In the United Kingdom, meanwhile, there are various surveillance systems in place and inspectors make regular visits to markets and merchants' premises. Several countries also stipulated that landed fish have to be weighed on validated scales in order to ensure accuracy.

Once data have been entered in national systems, they go through checking procedures (automatic in most cases) designed to verify internal consistency. Various cross-checks (e.g. logbooks versus landing declarations and logbooks versus sales notes) are carried out. The comparison and linking of sales notes with landing declarations is automated in several countries. In Latvia, for example, quarterly and annual data collected by the national statistical institute are used for cross-checking data on landings and catches from administrative sources. In Malta and Romania, cross-checks are carried out by technical experts. In the United Kingdom, the authorities carry out thorough cross-checks on quota species on a monthly basis. Greece, Croatia and Slovenia also report having procedures in place for monitoring consistency over time.

A very large majority of countries stated that the reported average landings' prices per tonne are derived from the exhaustive information obtained from administrative sources, i.e. the prices are based exclusively on sales notes (values) and logbooks or landing declarations (quantities). Where price information is missing, average unit prices are estimated using relevant available data, e.g. average reference prices by species, adjusted prices of sold products, international trade data, average prices for fish of the same category and presentation and queries to fishing companies.

Some countries reported having experienced delays in receiving data from their small-scale fleet. The data submitted were also, on occasion, incomplete. Delays in receiving sales notes on landings in other Member States or non-EU countries were also mentioned. Only very few countries explicitly declared the data on non-quota species to be less reliable (France, Finland, the Netherlands and the United Kingdom). Some countries are lacking automatic procedures for validation.

The data submitted for 2014 showed significant progress to have been made. There were fewer errors in the sending process, more countries provided their datasets on time and there was good cooperation between data providers and the Commission in cases where further checks or corrections were requested. The long-standing difficulties affecting Germany's landings data up to reference year 2013 were also resolved. Nevertheless, response times have remained long for the small number of countries where this has persistently been a problem (Germany, France, Romania and Iceland). At the date of publication of this report, Greece's data had not been able to be finalised due to a pending revision of some species codes. Bulgaria submitted its 2014 data on catches and landings three months late.

3. USE OF THE DATA (DATA DISSEMINATION)

In addition to publishing the country data at national level, countries' reports are also made available through Eurostat's dissemination database at

<http://ec.europa.eu/eurostat/data/database>. Based on these data, Eurostat produces articles for the *Statistics Explained*⁴ series and *The Agriculture, forestry and fishery statistics statistical book*⁵. Data collected under the Landings Regulation are essential for sound policymaking. In particular, they are of utmost importance for the Common Fisheries Policy (CFP) that entered into force on 1 January 2014 and is designed to ensure environmentally, economically and socially sustainable fisheries and aquaculture. Very high quality data are needed to be able to implement the new requirements introduced by the CFP, which set sustainable catch limits, criteria for more selective catches and landings obligations. Data on landings of fisheries products made available by Eurostat are also a major source of information for the European Market Observatory for Fisheries and Aquaculture (EUMOFA).

4. COST-EFFECTIVENESS

Sixteen countries were able to estimate the administrative burden created by the preparation and submission of the data required under the Landings Regulation, and nine were also able to estimate their production costs in monetary terms. The information provided relates to the entire set of data on catches and landings submitted to Eurostat. With similar sources and tools being used to produce different parts of the data, it is difficult to dissociate the costs of one element from the total. The burden and costs associated with providing the data differ significantly between countries: seven countries reported needing between 15 and 40 hours to prepare and submit the data requested by Eurostat, six countries estimated the time taken at between 80 and 150 hours, and three countries reported a burden of more than 150 hours work. The incurred cost was estimated to be less than 1 500 euros by four countries, between 2 000 and 3 000 euros by another four, and above 7 000 by one Member State.

5. CONCLUSIONS

In most cases, administrative data sources provide a full census of fishing activities. The widespread use of electronic reporting and the introduction of automatic validation systems has increased confidence in data quality and allowed countries to improve their punctuality in submitting data.

Nonetheless, the weaknesses in data collection mentioned by survey respondents and the difficulties experienced by Eurostat during the data validation process show that there is still room for improvement. It appears, for example, that longer response times and greater difficulties in performing data checks are seen for countries that do not have centralised systems. In these cases, checking back to decide whether outliers are to be accepted or corrected can be a complex and time-consuming process.

⁴ [Fishery statistics - Statistics Explained](#)

⁵ [Agriculture, forestry and fishery statistics — 2015 edition - Product - Eurostat](#)

On several occasions, countries submitted corrections to the data when errors were identified by Eurostat during its cross-checking between statistics on catches and landings. This suggests that the consistency checks being carried out at national level are insufficient.

Several countries are, however, currently taking steps to improve their systems. Germany and France are working on new control and validation systems, which are to be operational by mid and end-2016 respectively. Cyprus is finalising a tender to implement automatic validation, which will reduce discrepancies between different data sources. It also plans to build a centralised system linking all data sources. Estonia is taking steps to introduce further automation.

Eurostat prepared a questionnaire to be filled in by countries before launching the 2014 data collection exercise. A set of practical guidelines for reporting statistics on landings was then produced, on the basis of the replies received. The guidelines give precise instructions on which landings should or should not be included, and on how they should be reported. There was felt to be a need for such guidelines in order to harmonise national practices and avoid distortions in aggregated data. Use of these guidelines should result in better quality data.

6. RECOMMENDATIONS

Some of the shortcomings highlighted in the previous Report⁶ have not yet been resolved in some countries. These are related namely to the questionable quality of primary data and to validation systems that are not (or not fully) centralised and automated. In some cases, greater difficulties seem to arise when several different organisations are responsible for the data. The countries concerned are therefore strongly encouraged to strengthen communication and cooperation between the various institutions involved. Linking all source data and implementing automatic consistency and plausibility checks are also essential steps for improving the reliability of data and ensuring data is submitted on time.

Cases causing greater concern, such as Italy lacking data on fishing activities in the Eastern Central Atlantic and Western Indian Ocean, are to be addressed in very close cooperation with the national authorities concerned.

At the same time, further steps need to be taken to simplify the process of preparing and submitting the data. This would help to reduce the burden on data suppliers. In particular, code lists should be aligned, as far as is possible, with those that have to be used under other Regulations. This is notably the case for the presentation codes, which could be better aligned with the codes set out in Commission Implementing Regulation (EU) No 404/2011.

Steps should also be taken to improve the conversion factors used to calculate the live weight of fish products. These should be more precise and should take into account both how the fish is preserved on board and the type of processing. More accurate conversion factors would ensure greater consistency between countries as regards the conversion into live weight and the link between catches and landings. They would also allow more effective cross-

⁶ Document COM(2014) 240 final

checks to be performed against the catch statistics reported under Regulations (EC) No 216/2009⁷, (EC) No 217/2009⁸ and (EC) No 218/2009⁹ of the European Parliament and of the Council on the submission of nominal catch statistics by Member States.

⁷ Regulation (EC) No 216/2009 of the European Parliament and of the Council of 11 March 2009 on the submission of nominal catch statistics by Member States fishing in certain areas other than those of the North Atlantic (OJ L 87, 31.3.2009, p. 1).

⁸ Regulation (EC) No 217/2009 of the European Parliament and of the Council of 11 March 2009 on the submission of catch and activity statistics by Member States fishing in the north-west Atlantic (OJ L 87, 31.3.2009, p. 42).

⁹ Regulation (EC) No 218/2009 of the European Parliament and of the Council of 11 March 2009 on the submission of nominal catch statistics by Member States fishing in the north-east Atlantic (OJ L 87, 31.3.2009, p. 70).