

# LANDING THE BLAME

OVERFISHING IN THE ATLANTIC 2018

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# LANDING THE BLAME: OVERFISHING IN THE ATLANTIC 2018

## **Uncovering the EU Member States most responsible for setting fishing quotas above scientific advice**

***Fisheries ministers risk damaging our natural resources beyond repair by consistently setting fishing limits above scientific advice. This is our third year running a series of briefings to identify which Member States are standing in the way of more fish, more profits, and more jobs for European citizens.***

Food for an additional 89 million EU citizens. An extra €1.6 billion in annual revenue. Over 20,000 new jobs across the continent. Far from being a pipe dream, all of this could be a reality, if we paid more attention to one of Europe's most significant natural resources – our seas.<sup>1</sup> If EU waters were properly managed – with damaged fish stocks rebuilt above levels that could support their maximum sustainable yield (MSY) – we could enjoy their full potential within a generation.<sup>2</sup>

### **Fishing limits vs scientific advice**

Every year, fisheries ministers have an opportunity to make this a reality when they agree on a total allowable catch (TAC) for commercial fish stocks. Scientific bodies, predominantly the International Council for the Exploration of the Sea (ICES), provide information about the state of most stocks and recommend maximum catch levels.<sup>3</sup> But for many years, this scientific advice has not been heeded.

Our historical analysis of agreed TACs for all EU waters between 2001 and 2017 shows that, on average, seven out of every 10 TACs were set above scientific advice. While the percentage by which TACs were set above advice declined throughout this period (from 42% to 7%), the proportion of TACs set above advice did not.<sup>4,5,6</sup>

The reformed Common Fisheries Policy (CFP) that entered into force in 2014 aims to restore and maintain populations of fish stocks above levels capable of supporting MSY. The corresponding exploitation rate was to be achieved by 2015 where possible and by 2020 at the latest for all stocks.<sup>7</sup> Following scientific advice is essential if we are to achieve this goal, end overfishing, and restore fish stocks to healthy levels.

## **Agreements behind closed doors**

The negotiations over TACs are held by the Agricultural and Fisheries configuration of the EU Council of Ministers. These negotiations are not public, only their outcomes are. This lack of transparency means that ministers are not on the hook when they ignore scientific advice and give priority to short-term interests that risk the health of fish stocks. This briefing, a continuation of the *Landing the Blame* series, reveals which Member States and ministers are behind decisions that go against the EU's long-term interests. This conclusion is reached by analysing the outcomes of the negotiations and calculating which Member States end up with TACs above scientific advice. The key assumption is that these Member States are the main drivers of overfishing, either because they have been actively pushing for fishing limits to be set above scientific advice, or they have failed to prevent such limits being put in place. Freedom of Information Requests have revealed that the results of *Landing the Blame* correspond well with the Member State positions heading into the Council negotiations.<sup>8</sup>

## **The Atlantic 2018 TACs**

During the December 2017 negotiations, ministers set the TACs for the majority of commercial EU fish species for 2018 – a critical moment with significant implications for European fishers' livelihoods and the sustainable management of the natural resource. This analysis covers 124 TAC decisions made (or confirmed) at this meeting. It shows that where comparable scientific advice was available, 57 TACs were set above advice, amounting to over 206,000 tonnes of excess TAC. This is continuing the trend of permitting overfishing in EU waters with Atlantic TACs set 9% above scientific advice on average – a small increase from the 2017 TACs (8%). The earlier negotiations for the 2018 Baltic Sea TACs also set them above scientific advice, with *Landing the Blame Baltic 2018* reporting that four out of 10 TACs were set above scientific advice.

For the 2017 Atlantic TACs, Ireland, the United Kingdom, Belgium, and the Netherlands top the league table of Member States with the highest percentage of their TAC in excess of scientific advice (Table 1). These Member States were involved with TAC decisions that allow fishing at 18%, 15%, 8% and 8%, respectively, above levels that scientists have determined to be consistent with the sustainable management of these fish stocks.

The UK, Ireland, the Netherlands, and Denmark are the worst offenders in terms of the total tonnage of TAC set above advice. Ministers representing these Member States have received the largest TAC increases above scientific advice in terms of tonnes and are

therefore the most responsible for impeding the transition to sustainable fisheries in the EU.

**Table 1. The overfishing league table.**

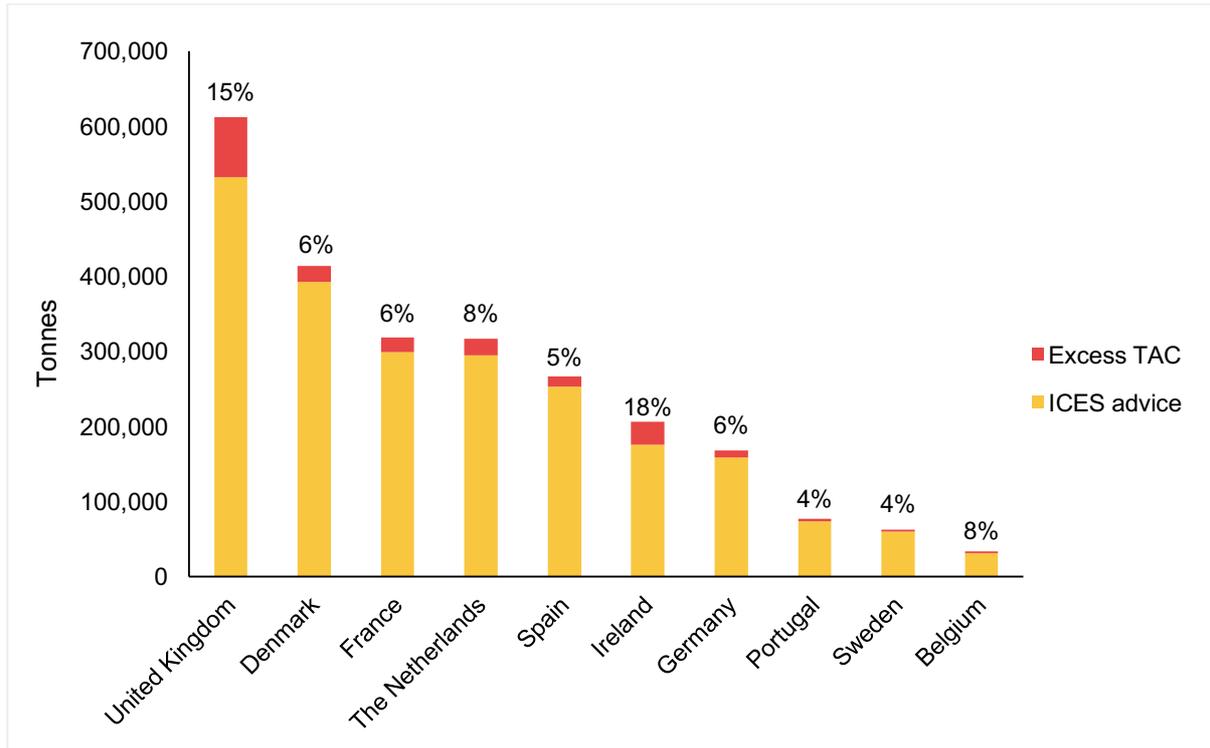
Member State	Minister/Representative	Excess TAC (tonnes)	Excess TAC (%)
Ireland	Michael Creed	31,127	17.8%
United Kingdom	George Eustice	79,893	15.0%
Belgium	Joke Schauvliege	2,493	8.2%
The Netherlands	Carola Schouten	22,104	7.5%
France	Stéphane Travert	19,370	6.5%
Germany	Christian Schmidt	9,315	5.9%
Denmark	Karen Ellemann	21,898	5.6%
Spain	Isabel García Tejerina	13,578	5.4%
Sweden	Sven-Erik Bucht	2,495	4.2%
Portugal	Ana Paula Vitorino	2,800	3.8%

**Note:** Member States with fewer than five comparable TACs have been excluded.

Table 1 allocates the excess TAC to each Member State and minister/representative present during the TAC negotiations.<sup>9</sup> Ireland tops the league table with 31,127 tonnes of quota above scientific advice – equal to 18%. This is largely due to mackerel<sup>1</sup> and herring in the Irish Sea and the West of Scotland. Ireland also topped the league table for the 2016 Atlantic TACs.<sup>10</sup>

Analysing total ICES advice and excess TAC by Member State illustrates that excess TAC is not just a function of the total amount of fishing a Member State carries out (Figure 1). If that were the case, then each Member State's excess total TAC would be proportional to its total advice. Instead, we see a spectrum of excess TAC percentages, with some Member States frequently towards the top or bottom of these annual calculations. Although this does not in itself prove that the worst-offending Member States are pushing for higher TACs (that would require greater transparency around the negotiations), it is consistent with this thesis.

<sup>1</sup> Although the decision on mackerel is in line with the long-term management strategy (LTMS) for the stock, this strategy, by limiting TAC reductions to 20%, does not comply with scientific advice for FMSY. There is also the problem that Iceland and Greenland continue to operate outside of the LTMS.



**Figure 1. Excess TAC by EU member state.**

## 2018 IN CONTEXT

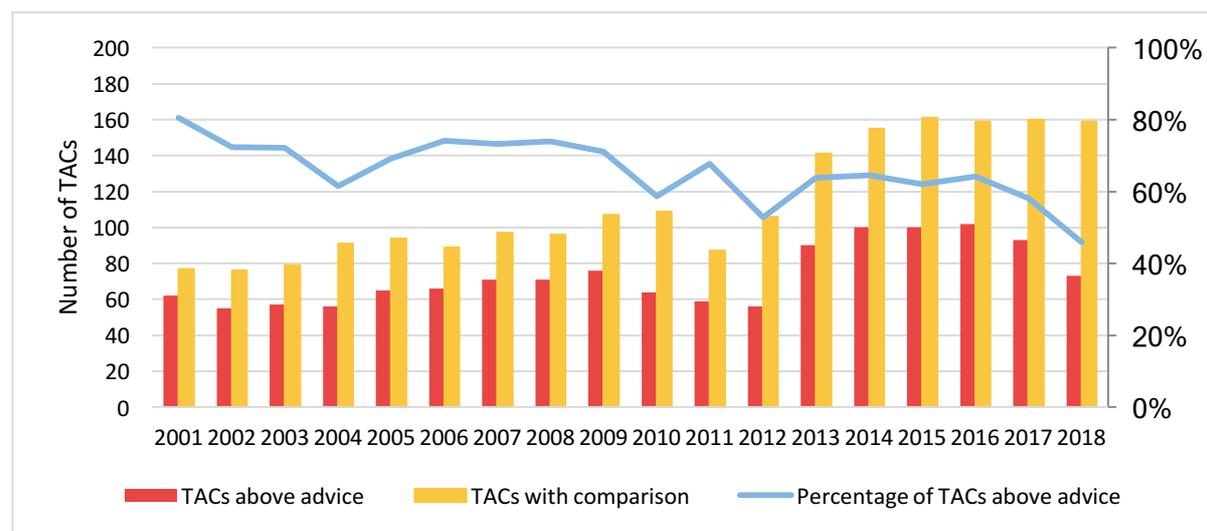
The percentage of excess TAC set during the Atlantic negotiations rose in 2018 (Figure 2), also pushing up the excess TACs for all regions combined.



**Figure 2. Excess TAC 2001–2018.**

The number of TACs above advice across all regions declined in the setting of 2018’s TACs but remains alarmingly high (Figure 3). In order for the CFP’s objectives to be

fulfilled, excess TACs must decline to zero by 2020, but this is unlikely to happen if little progress is made on a yearly basis.



**Figure 3. Number of TACs above ICES advice.**

The full ICES and Council dataset used for the analysis in this briefing is available online on the New Economics Foundation website for download and further analysis.<sup>11</sup>

## DISCUSSION

The 2018 results show insufficient progress towards fishing in line with scientific advice. As long as ministers delay bringing fishing rates to sustainable levels, stocks will not deliver optimally, costing revenue and jobs in the long run.

### Ministerial statements

Each year, ministers emerge from these negotiations declaring victory for their fishing fleets, and the 2018 negotiations were no exception (see text box). From fishing ministers, including those at the top of the league table, we hear that they fought hard and achieved the best possible deal for their fishing industry.

For their part, representatives of the fishing industry were fairly supportive of the outcomes. Scottish fishing leaders called the outcome ‘broadly fair’<sup>12</sup> and the Killybegs Fishermen’s Organisation felt they has achieved a ‘favourable result’ for several stocks, thanking ‘Minister Creed and his officials in working closely with us.’<sup>13</sup>

**Michael Creed, Minister for Ireland**

“The total €152m value of the whitefish quotas secured for the Irish fishing fleet amounts to a 8% increase in value from last year and a 3% increase in volume. I am satisfied that this is a good and balanced result overall.”<sup>14</sup>

**George Eustice, Minister for the United Kingdom**

“Compared to 2017, this is an extra £44m of fishing opportunities which means our industry will go into 2018 in strong health.”<sup>15</sup>

**Fergus Ewing, Minister for Scotland**

“We have secured a strong result for Scotland's fishermen, with deals worth more than £440m to the industry and crucial increases for many of our key species. So overall we achieved a great number of our objectives, but there were some disappointments. In the west coast, we fought very hard to get an increase for our prawn fishermen and we were disappointed we didn't secure a lower reduction in the quota for that particular species.”<sup>16</sup>

**Isabel García Tejerina, Minister for Spain**

“It has been possible to improve the initial proposal and to reduce the cuts for almost all species, achieving stability for the Spanish fleet.”<sup>17</sup>

***Socio-economic factors***

That TACs should be set in line with scientific advice is clear from the text of the CFP. Article 2 states that “the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive and incremental basis at the least by 2020 for all stocks.”<sup>18</sup> Delays to achieving MSY past 2015 should only be allowed “if achieving the exploitation rates by 2015 would seriously jeopardise the social and economic sustainability of the fishing fleets involved” (Recital 7).<sup>19</sup>

While the scope of the analysis conducted here is to find where scientific advice has not been followed, there is the possibility that some of these increases can be justified for socio-economic reasons. To date however, the Council has produced no documents

documenting socio-economic necessity in support of their decisions, and the Atlantic 2018 TACs were no exception.

Some Member States have sought to provide socio-economic evidence, but what has been produced (at least publicly) is a simple multiplication of that change in TAC by the price of the catch. This form of analysis is not only simple but extremely one-sided. A higher TAC will by definition always be the optimal outcome. A policy that is designated to remove fish stocks needs to be evaluated over a multi-year time period. It should also take into account the current financial performance of fleets (i.e. viability analysis).

Studies of fish stock recovery pathways show that the faster the transition to sustainable fishing the better, as the net present value is higher the greater the number of years producing MSY.<sup>20,21</sup> Greater benefits have also been found from fishing in lower end of MSY ranges compared to the upper end.<sup>22,23,24</sup>

### ***Troubling TACs set with third countries***

Several important TACs are negotiated with third countries through bilateral negotiations with Norway and coastal states negotiations. The outcomes of these negotiations are confirmed at December Council.

Due in part to the structure of these negotiations where there is a constant threat of parties leaving the negotiating table and setting a unilateral TAC, these negotiations have a history of departing from scientific advice. Historically this divergence has been around 24% excess TAC for those with a large third country share (>33%) and 19% excess TAC for those with a small third country share (<33%).<sup>25</sup> This divergence continued for the 2018 TACs with 11% excess TAC for those with a large third country share and 9% excess TAC for those with a small third country share. This is mostly due to the decision on mackerel where management plans have been applied that do not reach MSY in 2018.

### ***Limits vs catches***

It should be noted that the amount of fish caught is rarely the entirety of the agreed quota. For economic and biological reasons, fishing may fall under the quota whereas illegal, unreported, and unregulated fishing may push fishing pressure above the agreed limit. Rather than analysing fishing pressure, this series of briefings specifically analyses the policy intent of the Council of Ministers.

### ***A lack of transparency in Council meetings***

Under Article 3 of the reformed CFP, 'transparency' is mentioned as one of the CFP's principles of good governance, yet the secretive negotiations in setting TACs and poor

data availability undermine this principle and make the process less open to scrutiny. This study is therefore also limited in what it can achieve, as data shortages prevent a comprehensive analysis. Member States that top the league table for excess TAC should therefore be major advocates of increased transparency, if judging performance by outcomes is insufficient.

A 2017 investigation by Corporate Europe Observatory revealed some that fishing industry lobbyists have used press passes to access the EU Council building during crucial ministerial negotiations on fishing quotas.<sup>26</sup> Perhaps not surprisingly, the fishing industry lobbyists were representing fleets from Member States near the top of the *Landing the Blame* league table for the Northeast Atlantic TACs (Spain and the Netherlands).<sup>27</sup>

There appears to be progress made on this issue as there are reports that the Council denied access to three representatives of the fishing industry from the Netherlands, Belgium, and Denmark who tried to access the Council building on press passes.<sup>28</sup>

### ***A lack of transparency in TAC determination from ICES advice***

Mirroring the difficulties with transparency around the Council negotiations is the issue of how the TACs were determined. Ideally this exercise of comparing ICES advice and TACs should be a straightforward process that can be easily scrutinised. This is possible with the right request to ICES, but is currently far from what is practiced.

Data on international TAC agreements are difficult to find, making it hard to properly apportion responsibility for overfishing. As a result, TACs had to be assembled from press releases after the negotiations have concluded, but a more official and finalised source would aid this important analysis. The Commission's online page for these agreements is incomplete in its coverage.<sup>29</sup> Using data compiled from *Landing the Blame: Overfishing in EU Waters 2001–2015*, the third country share of TACs was calculated by taking an average of the difference between total TAC and EU TAC in years where both were reported.

Matching ICES and TAC zones is also a perennial issue that could and should be resolved.<sup>30</sup>

All of these required inputs for determining TACs from ICES advice should be made publicly available in the interest of transparency and access to information by any stakeholder. This is the only way for civil society to properly hold representatives to account.

### ***The landing obligation and quota top-ups***

The landing obligation (LO) – part of the reformed CFP – requires vessels fishing certain stocks to land all their catches in an effort to reduce waste and unaccounted fishing mortality. 2018 is the fourth year of its implementation, with several demersal species being covered for the first time. ICES-advised fishing limits are usually given in terms of landings, but for stocks that are under the LO, they need to be given as a catch value (i.e. an amount that includes any fish discarded at sea). Additionally, some vessels under the LO are given exemptions that allow them to discard given quantities of fish if it is not feasible to reduce discards or when discarded fish are likely to survive.

For the 2018 TACs, several stocks that are now under the LO received quota top-ups (also referred to as quota uplift) in order to account for their increased landings of previously discarded fish. This process also took place for several TACs in 2016 and 2017. The reasoning behind the quota top-ups is that before the LO, additional fish that would have died at sea as discards are now being landed and counted against quota, while the level of fishing mortality does not change. This assumes that the LO is being enforced, otherwise the quota top-ups simply function as additional quota and would lead to higher fishing mortality.

These quota top-ups present data issues, as ICES catch advice needs to be modified to cover only for those stocks and vessels under the LO with adjustments made to cover the various exemptions. This is a very difficult task because easily accessible data on vessel types and discards are not available and the Commission does not provide information on how it carries out calculations in proposing TACs.

For this study, the published top-up percentages were reversed to allow the agreed TACs to be compared directly to the ICES landings advice. This approach focuses on whether the TAC follows scientific advice, rather than attempting to evaluate the application of quota top-ups with little information available.

## **OFFTRACK FOR 2020**

Article 2.2 of the CFP calls for fish stocks to be rebuilt to levels that can support the maximum sustainable yield “by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks”. With the 2020 deadline fast approaching, EU fisheries are not on track, with calculations showing that at the current rate it will take until 2034 to meet the sustainability policy objective.<sup>31</sup>

No impact assessments have been published by the European Commission or other actors to justify this delay. The only socio-economic evidence that has been published is from Member States on the impact of the Commission’s TAC proposal. This evidence is

not only methodologically weak in terms of omitting quota uptake and price elasticities, it is focused on the economic impact for only one year – entirely missing the purpose of TACs as a tool for stock recovery over multiple years.<sup>32</sup> This is crucially important as a study in the *Journal of Marine Policy* found that the earlier the transition to sustainable fisheries in the northeast Atlantic, the larger the net benefits (as measured in net present value)<sup>33</sup> – a result that has also been found for US fisheries.<sup>34</sup>

The consequence of this delay is that come 2020 there will be a need for large TAC reductions across many species, with potentially large socio-economic consequences. At this point it will be clear that more effort to restore fish stocks should have been made earlier – especially during the current period where overall fleet profits are high due to low oil prices and an increasing abundance of some fish stocks. Easing the impact of the 2020 deadline must start with the TAC decisions made later this year.

To have a chance of meeting this deadline we need to think about the TAC negotiations differently. Headlines from the recent December Council that “Ireland emerges as big winner of fisheries Council”<sup>35</sup> reflect the framing of these negotiations as a battle to secure larger TACs. This thinking must change.

# ANNEX

## Atlantic TACs compared to scientific advice (tonnes)

Species	Area	Scientific advice (tonnes)	TAC agreed by ministers (tonnes)	Excess TAC (tonnes)	Excess TAC (%)	Belgium	Denmark	France	Germany	Ireland	The Netherlands	Portugal	Spain	Sweden	United Kingdom
Anchovy	VIII	33,000	33,000	0	0%	0	0	0	0	0	0	0	0	0	0
Anglerfish	VIIIc, IX and X; Union waters of CECAF 34.1.1	4,546	3,955	0	0%	0	0	0	0	0	0	0	0	0	0
Anglerfish	Union waters of IIa and IV	15,808	16,225	417	3%	15	33	3	16	0	11	0	0	0	340
Anglerfish	Norwegian waters of IV	1,656	1,700	44	3%	1	34	0	1	0	0	0	0	0	8
Anglerfish	VI; Union and international waters of Vb; international waters of XII and XIV	8,944	9,180	236	3%	8	0	104	10	24	8	0	9	0	73
Anglerfish	VII	29,535	33,516	3,981	13%	368	0	2,361	41	302	48	0	146	0	716
Anglerfish	VIIIabde	7,913	8,980	1,067	13%	0	0	904	0	0	0	0	163	0	0
Basking shark	EC waters of zones IV, VI and VII	0	0	0	0%	0	0	0	0	0	0	0	0	0	0
Blue ling	Union and international waters of Vb, VI, VII	10,463	10,463	0	0%	0	0	0	0	0	0	0	0	0	0
Blue ling	International waters of XII	0	286	286	0%	0	0	7	0	0	0	0	273	0	2

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Blue ling	Union and international waters of II and IV	0	53	53	0%	0	4	23	4	4	0	0	0	0	14
Blue ling	Union and international waters of III	0	8	8	0%	0	3	0	2	0	0	0	0	3	0
Blue whiting	VIIIc, IX and X; Union waters of CECAF 34.1.1	53,473	53,473	0	0%	0	0	0	0	0	0	0	0	0	0
Blue whiting	Union and international waters of I, II, III, IV, V, VI, VII, VIIIa, VIIIb, VIIIc, VIIIe, XII and XIV	401,363	401,363	0	0%	0	0	0	0	0	0	0	0	0	0
Blue whiting	Faroese waters	2,500	2,500	0	0%	0	0	0	0	0	0	0	0	0	0
Blue whiting	Norwegian waters of II and IV	0	0	0	0%	0	0	0	0	0	0	0	0	0	0
Boarfish	Union and international waters of VI, VII and VIII	20,380	20,380	0	0%	0	0	0	0	0	0	0	0	0	0
Capelin	Ib	0	0	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	IV; Union waters of IIa; that part of IIIa not covered by the Skagerrak and Kattegat	24,686	24,686	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	I, Ib	29,218	29,218	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	Norwegian waters of I and II	23,008	23,008	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	Kattegat	254	630	376	148%	0	232	0	5	0	0	0	0	139	0
Cod	Skagerrak	4,111	4,111	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	Vlb; Union and international waters of Vb west of 12° 00' W and of XII and XIV	14	74	60	429%	0	0	10	1	13	0	0	0	0	36

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Cod	VIa; Union and international waters of Vb east of 12° 00' W	0	0	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	VIIa	1,073	659	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	VIIb, VIIc, VIIe-k, VIII, IX and X; Union waters of CECAF 34.1.1	3,076	3,076	0	0%	0	0	0	0	0	0	0	0	0	0
Cod	VIIId	1,733	1,733	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	IIIa; Union waters of Subdivisions 22-32	453	436	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	VIIhjk	268	382	114	43%	10	0	19	0	51	15	0	0	0	19
Common sole	Union waters of IIa and IV	15,716	14,702	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	VIIa	0	40	40	0%	10	0	0	0	17	3	0	0	0	10
Common sole	VIIbc	24	42	18	75%	0	0	3	0	15	0	0	0	0	0
Common sole	VIIId	3,866	3,087	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	VIIe	1,239	1,202	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	VIIIfg	931	901	0	0%	0	0	0	0	0	0	0	0	0	0
Common sole	VIIIab	3,725	3,621	0	0%	0	0	0	0	0	0	0	0	0	0
Greater silver smelt	Union and international waters of I and II	67	90	23	34%	0	0	2	6	0	5	0	0	0	10



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Herring	IIIa (by-catches)	6,659	6,659	0	0%	0	0	0	0	0	0	0	0	0	0
Herring	Union and international waters of I and II	25,012	28,319	3,307	13%	1	1,133	49	198	293	405	4	4	420	724
Herring	Union and international waters of Vb, VIb and VIaN	0	4,170	4,170	0%	0	0	88	466	630	466	0	0	0	2,520
Herring	Union and Norwegian waters of IV north of 53° 30' N	359,959	359,977	18	0%	0	6	1	3	0	4	0	0	0	4
Herring	IIIa	41,768	41,768	0	0%	0	0	0	0	0	0	0	0	0	0
Herring	IVc, VIId	66,037	66,040	3	0%	1	0	1	0	0	1	0	0	0	0
Herring	Norwegian waters south of 62° N	1,239	1,239	0	0%	0	0	0	0	0	0	0	0	0	0
Herring	VIaS , VIIb, VIIC	0	1,630	1,630	0%	0	0	0	0	1,482	148	0	0	0	0
Herring	VIIa	7,016	7,016	0	0%	0	0	0	0	0	0	0	0	0	0
Herring	VIIg,h,j,k	5,445	10,127	4,682	86%	0	0	289	52	4,046	289	0	0	0	6
Horse mackerel	Union waters of IIa, IVa; VI, VIIa-c,VIIe-k, VIIIa, VIIIb, VIId and VIIIc; Union and international waters of Vb; international waters of XII and XIV	99,470	99,470	0	0%	0	0	0	0	0	0	0	0	0	0
Horse mackerel	Union waters of IVb, IVc and VIId	14,574	12,629	0	0%	0	0	0	0	0	0	0	0	0	0
Horse mackerel	IX	55,555	55,555	0	0%	0	0	0	0	0	0	0	0	0	0
Horse mackerel	VIIIc	16,000	16,000	0	0%	0	0	0	0	0	0	0	0	0	0
Lemon sole and witch	Union waters of IIa and IV	6,003	6,391	388	6%	21	58	16	7	0	48	0	0	1	237



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Northern prawn	IIIa	5,594	3,916	0	0%	0	0	0	0	0	0	0	0	0	0
Northern prawn	Union waters of IIa and IV	0	1,957	1,957	0%	0	1,453	0	0	0	14	0	0	59	431
Norway lobster	VII	25,508	25,508	0	0%	0	0	0	0	0	0	0	0	0	0
Norway lobster	VIIIc; Union waters of CECAF 34.1.1	0	0	0	0%	0	0	0	0	0	0	0	0	0	0
Norway lobster	Union waters of IIa and IV	23,792	23,792	0	0%	0	0	0	0	0	0	0	0	0	0
Norway lobster	IIIa; Union waters of Subdivisions 22-32	11,738	11,738	0	0%	0	0	0	0	0	0	0	0	0	0
Norway lobster	VI; Union and international waters of Vb	10,930	11,564	634	6%	0	0	5	0	9	0	0	1	0	619
Norway lobster	VIIIabde	3,614	3,614	0	0%	0	0	0	0	0	0	0	0	0	0
Norway lobster	IX and X	381	381	0	0%	0	0	0	0	0	0	0	0	0	0
Norway pout	IIIa; Union waters of IIa and IV	55,000	55,000	0	0%	0	0	0	0	0	0	0	0	0	0
Plaice	VIIa	1,793	1,793	0	0%	0	0	0	0	0	0	0	0	0	0
Plaice	IV; Union waters of IIa; that part of IIIa not covered by the Skagerrak and the Kattegat	78,968	102,906	23,938	30%	1,473	4,788	276	1,381	0	9,207	0	0	0	6,813
Plaice	VIIbc	24	74	50	208%	0	0	7	0	43	0	0	0	0	0
Plaice	VIIde	10,036	10,360	324	3%	53	0	177	0	0	0	0	0	0	94



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Sprat	VIIde	2,354	3,296	942	40%	5	306	66	5	0	66	0	0	0	495
Spurdog/ dogfish	Union and international waters of I, V, VI, VII, VIII, XII and XIV	0	270	270	0%	20	0	83	4	53	0	0	10	0	100
Turbot and brill	Union waters of IIa and IV	7,102	7,102	0	0%	0	0	0	0	0	0	0	0	0	0
Tusk	IIIa; Union waters of Subdivisions 22-32	32	31	0	0%	0	0	0	0	0	0	0	0	0	0
Tusk	Union waters of IV	257	251	0	0%	0	0	0	0	0	0	0	0	0	0
Tusk	Norwegian waters of IV	174	170	0	0%	0	0	0	0	0	0	0	0	0	0
Tusk	Union and international waters of I, II and XIV	10,451	21	0	0%	0	0	0	0	0	0	0	0	0	0
Tusk	Union and international waters of V, VI and VII	1,234	1,207	0	0%	0	0	0	0	0	0	0	0	0	0
Whiting	IIIa	169	1,031	862	510%	0	777	0	0	0	3	0	0	83	0
Whiting	VIIa	0	80	80	0%	0	0	3	0	46	0	0	0	0	31
Whiting	VIII	1,613	2,540	927	57%	0	0	556	0	0	0	0	371	0	0
Whiting	IV; Union waters of IIa	13,937	13,991	54	0%	1	5	8	1	0	3	0	0	0	36
Whiting	VI; Union and international waters of Vb; international waters of XII and XIV	11	213	202	1836%	0	0	25	1	61	0	0	0	0	116
Whiting	VIIb, VIIc, VIId, VIIe, VIIf, VIIg, VIIh, VIIj and VIIk	16,518	17,159	641	4%	6	0	385	0	178	3	0	0	0	69
<b>Total</b>		<b>2,265,215</b>	<b>2,427,844</b>	<b>205,772</b>	<b>9%</b>	<b>2,493</b>	<b>21,898</b>	<b>19,370</b>	<b>9,315</b>	<b>31,127</b>	<b>22,104</b>	<b>2,800</b>	<b>13,578</b>	<b>2,495</b>	<b>79,893</b>

## ENDNOTES

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