



The good, the bad and the ugly: a ranking of EU countries' progress to achieve sustainable fishing.

Methodology briefing

For more information, please contact:

Justine Maillot: justine.maillot@greenpeace.org, 0032 (0)2 274 1922

May 2015

In December 2013, the 28 European Union (EU) member states and the European Parliament adopted a new set of rules to regulate fishing activities under the EU's Common Fisheries Policy (CFP). They updated the main management priorities, targets and timelines in an effort to address policy and implementation failures, which had previously led to overexploitation of fish stocks, significant environmental impacts, excessive fishing capacity and resulting low economic performance of the sector.

Since January 2014, European countries have had to comply with the new CFP.

Why does Greenpeace publish the ranking of member states?

During past decades, one of the main failures in fisheries management has been the lack of implementation and compliance by member states. Two reports of the EU Court of Auditors and several score boards published by the European Commission prior to 2007 pay testimony to this.

The recent reform has delivered substantial progress (on paper), in particular in relation to stock and fleet management and the allocation of fishing opportunities. However, the reform's success will critically depend on the political will of national governments to implement the new rules.

Regrettably, the European Commission stopped publishing CFP compliance score boards in 2007, which is why Greenpeace has begun to rank countries' performance in complying with some of the key provisions of the CFP.

Why is Greenpeace focussing on access to fishing and fishing capacity management?

Fishing is regulated by input controls (how much technology and time is invested to catch fish) and output controls (how much can be caught). Consequently, it is important that countries monitor, control and disclose information about who has been granted access to the fishery, how much was caught and with what type of equipment.

Excess fishing capacity (i.e. [overcapacity](#)) is considered to be one of the main drivers of overfishing. Since January 2014, governments have to assess and report fishing capacity by individual fleet segment (rather than for the fleet as a whole) in relation to national available fishing opportunities. They must also identify the capacity of vessels that fish exclusively outside EU waters and in the EU outermost regions. The content and quality of the reports have to meet the standards agreed and published in the Commission guidelines. All national reports are due on 31 May each year and must be made public. If the report shows that the capacity of a given fleet segment exceeds the corresponding fishing opportunities (overcapacity), the government must put in place an action plan to reduce its fleet's excessive capacity.

Countries must allocate fishing opportunities (i.e. provide access to fishing quotas, number of days at sea/effort and access to the fishing grounds) on the basis of environmental, social and economic criteria. The goal is to boost benefits for local economies and to minimise the adverse impacts of fishing by promoting low-impact fishing.

The overall amount of fish that can be caught is agreed annually or bi-annually at EU level and is then divided into national shares, before being allocated by governments to fishermen. The CFP requires that total allowable catches at EU level be brought below the so-called maximum sustainable yield (MSY) by 2015 and in exceptional cases no later than 2020. However, most total allowable catches for 2015 were set well above the limit, despite the legal deadline.

Over the past years, governments have put fishing quotas into the wrong hands, backing companies that deplete and destroy our seas, and small-scale out of work. In order to restore and preserve marine resources, low-impact fishermen should be given the lion's share of quotas, while keeping overall fishing within sustainable limits.

What methodology has Greenpeace used to rank member states?

The traffic light system

We have used a traffic light system to rank countries either:

- quantitatively, in which case member states scored either green (yes) or red (no); or
- qualitatively, in which case they scored green (yes, good), yellow (yes, moderate or partial) and red (no or insufficient);

Where we were not able to verify performance, countries were not ranked. This is indicated by an "empty" circle.

Access to fishing

Contribution to overfishing:

Perhaps the most controversial but telling scoring relates to an attempt to identify a country's relative impact on the stocks, either in terms of catches from overfished stocks, or in terms of the national share of 2015 total allowable catch (TAC) set above scientifically recommended levels. The latter effectively identifies those countries that are the greatest beneficiaries of setting fishing opportunities above the MSY limit.

We have ranked countries using data published by the 'New economics foundation' (NEF). They are based on the overall share of TAC that were set above scientifically recommended levels, calculated for those stocks that are managed by quota and that have been scientifically assessed. In addition, we have considered the general status of stocks in the Mediterranean, for which no TAC is set.

NEF figures derive from a comparison of the 2015 TAC (by stock) and the recommended catch limit for each stock. The difference between the actual and recommended level is then divided into national shares, using the same ratio used to allocate quotas. Once NEF aggregated figures, we calculated the percentage share of national quotas that are caught in excess of scientific advice. We ranked countries on the basis that either less than 5 percent of their national quota was taken in excess of scientifically recommended levels (yellow), or more than 5 percent (red).

The rationale for this calculation and ranking is the following: each country may use its negotiation power to increase TACs beyond the recommended level, or to support other countries in pushing for such increases. It is reasonable to assume that those countries most likely to benefit from the overall increase are most engaged in pushing for it, even if all countries exploiting the stock stand to gain proportionally. After all, each member state, regardless of its interest in the fishery, could use its negotiation power to oppose or even block respective increases. The extent to which a country stands to gain from the decision, is therefore a likely indication of its complicity in setting TACs above recommended levels and thus of its political "contribution" to overfishing.

Several constraints relating to the data and interpretation of this criterion should be considered, most notably:

- Many stocks fished inside and outside EU waters by EU fleets are not managed by TAC. The level of overfishing of these stocks has not been determined, nor can such overfishing be attributed to national shares. For instance, Spain ranks relatively low in terms of overall "contribution" to overfishing, but a large number of stocks fished by Spanish fishermen are not managed by quota or, in the case of tuna for instance, are managed under quotas which are set by regional fisheries management organisations. The overall "contribution" to overfishing of most EU member states is therefore higher than is captured by our methodology, sometimes substantially so.
- Similarly, some of the stocks for which the EU has set TACs above recommended levels are managed and fished collectively with non-EU countries, such as Norway and Iceland. The responsibility for setting TACs higher than the recommended level is therefore shared with these nations, each of which also contributes to overfishing. The ranking of the "contribution" to overfishing by EU countries does not take into account the fact that the largest beneficiary from overfishing of shared stocks may be outside the EU.
- Many member states and fishermen swap quotas after the TACs have been assigned; they swap across borders and between stocks. Information on quota swaps is often not public and has thus not been factored into the calculation. The extent to which a country may intend to swap quotas with another member state may influence the state's negotiation interest.
- To evaluate the full contribution to overfishing, one would need to consider also actual catches, including all illegal, unreported and unregulated catches and discards. However, this methodology only considers the TAC set by the Council of ministers (on paper).
- The applied methodology does not take into account the relative impact on the stock. A large stock, or a stock that is in relatively good shape, may, at least for a short period of time, be

relatively resilient to large-scale overfishing or high-volume catches, whereas a highly depleted or very small stock may be driven to collapse even at modest rates of overfishing or low-volume catches. This means that the sum weight of tonnes of fish caught in excess of recommended levels is not a measure of the impact on the stock. The percentage share of the national quota caught above recommended levels is a marginally better representation, but both measures are just potential indicators of the relative interest in setting TACs above scientifically recommended levels.

- Last but not least, the economic value of a tonne of fish depends on multiple factors, including the species of fish, the sales price per kilogramme and the employment generated per tonne caught. Therefore, the specific economic interest in negotiating a specific TAC increase above the recommended level is unlikely to correspond neatly to the scale of the increase when catches of different species are compared or combined. Plus, the specific interests in negotiating TAC increases beyond the recommend level are almost certainly determined by factors that go beyond economic interests.

We refer readers to the three NEF publications¹ for a more detailed description of the methodology used by NEF.

Transparency - who has access:

The UK is the first country to create a public register of quota holders, covering the majority share of their national quota. Without knowing who has access to fishing opportunities, it is impossible to verify whether the government has appropriately applied the required allocation criteria, nor is it possible to assess who might hold the greatest power in pushing for continued overfishing.

Progress made on access criteria:

This criterion simply ranks countries on the basis of whether, prior to January 2015, they had developed and/or were in the process of developing criteria for the allocation of fishing opportunities to fishermen, in accordance with Article 17 of the CFP Regulation.

Used access criteria:

This criterion simply ranks countries on whether, in 2015, they have allocated fishing opportunities (i.e. quotas and effort) on the basis of criteria in accordance with Article 17 of the CFP Regulation.

Capacity reports

Action to eliminate overcapacity:

This criterion ranks only those countries that have submitted an action plan to eliminate overcapacity, and is based on the quality of the action plan.

¹ NEF, Landing the blame - overfishing in Northern European waters:
http://b.3cdn.net/nefoundation/79d76401dba3d63022_5fm6b90q9.pdf
NEF, Landing the blame - overfishing in deep-sea waters:
http://b.3cdn.net/nefoundation/9eccf206f1f57066ff_prm6bpb61.pdf
NEF, Landing the blame - overfishing in the Baltic Sea:
http://b.3cdn.net/nefoundation/6b367a20b86e868eb1_s3m6bxigq.pdf

Quality of the 2014 capacity report:

This criterion ranks the quality and structure of 2014 countries' reports on efforts to balance their fleet capacity with fishing opportunities, and is based on the [evaluation of the Commission's Scientific, Technical and Economic Committee for Fisheries](#) (STECF). However in our assessment, some- countries including Bulgaria, Estonia, Germany and Malta were downgraded , because they failed to present an actual statement and evaluation of the balance of fleet segments with respective fishing opportunities. Without such evaluation, we considered that the report is inadequate and fails to meet the requirements of the CFP Regulation.

Gave access to the report:

During the first phase of the ranking, published in mid-February 2015, we asked whether countries had fulfilled their duty and published their 2014 reports on efforts to achieve a balanced fishing capacity in 2013. Countries that published their reports or made them available upon request got the green light. Countries that failed to make their reports available scored red.

Used the reporting guidelines:

During the first phase of the ranking we reviewed whether countries had used the EU's revised reporting guidelines in their 2014 reporting on fishing capacity. A number of governments had used the revised guidelines, but had provided incomplete data and/or omitted the analysis for one or several of the indicators, without giving a reason for that. These countries got a yellow light. Others covered all or most relevant data (green), or submitted extremely deficient reports (red).