

Inconsistencies in tropical tuna catch calculations and reporting by Spain

In October 2019, at the 21st Session of the Indian Ocean Tuna Commission (IOTC) Working Party on Tropical Tunas (WPTT), it was noted that the 2018 catches of bigeye tuna reported by the EU purse seine fleet alone exceeded the catches recorded by all purse seine fleets the previous year. The 2018 catch characteristics and species composition reported by the EU did not match the data reported by other purse seine fleets during the same year, nor the data reported by the EU purse seine fleet in years prior to 2018.

The WPTT noted the possibility of errors related to the estimation of the species composition for catches reported by the EU purse seine fleet in 2018. It was acknowledged that the matter arose from the Spanish component of the EU purse seine fleet and that this could be due to changes introduced in the type of statistical methodologies adopted for the production of final catch statistics by Spain in 2018, making specific reference to Spain's new method of estimation based on catch per vessel instead of T3. It was requested that the EU clarify the matter and report back to the Scientific Committee in 2019.

The relative species composition of Spain's reported log-associated (LS) purse seine catches in 2017 and 2018 were as follows:

Year	Bigeye	Skipjack	Yellowfin
2017	6% (7,926 t)	65% (83,426 t)	29% (36,583 t)
2018	12% (24,507 t)	66% (132,709 t)	22% (43,652 t)

When the same species composition identified for Spain's LS purse seine fleet in 2017 was applied by the WPTT to the total catches reported by the same fleet in 2018, the resulting revised total catch by species for the fleet and fishing mode in 2018 were as follows:

- Bigeye tuna: 12,405 t
- Skipjack tuna: 130,575 t
- Yellowfin tuna: 57,259 t

This method brings Spain's revised LS purse seine yellowfin tuna catch for 2018 to 13,606 t – or 31% – higher than was reported by the EU. Adding the remaining free school component of Spain's 2018 yellowfin tuna catch (approximately 1,666 t¹) brings Spain's total yellowfin tuna purse seine catch for 2018 to **58,925 t**.

However, according to official catch data provided by the Secretaría General de Pesca (SGP) of the Spanish Government to Blue Marine Foundation², Spain's revised yellowfin tuna catch total for 2018 is recorded as **46,991 t**. We understand that this total has been arrived at using the SGP's new system which uses data from landing reports and sale slips to monitor the utilisation of quota by

¹ This is calculated by subtracting the log-associated portion of the catch (43,652 t) from Spain's total reported yellowfin tuna purse seine catch for 2018 (45,318 t), as listed in the IOTC Nominal Catch Dataset.

² This information was received on 11 June 2020.

individual vessels, as outlined in the appended SGP document entitled *“Adoption of a new methodology to produce nominal catch statistics for the industrial tuna purse seine fleet of EU-Spain operating in the IOTC Area of Competence”*. In its most recent report, the IOTC Scientific Committee reiterated that this change in the methodology used for the production of catch statistics by Spain has resulted in a large increase in the reported bigeye catches in 2018 and that this increase was considered implausible by the WPTT.

Prior to 2018 and the introduction of this new system, quota was not issued to individual vessels. A yellowfin tuna catch limit of 45,682 t was assigned to Spain for 2017 by the EU. However, 2017 catch data submitted to the IOTC for Spain reported a catch total of **54,513 t**³. This catch total, showing an overcatch of 8,831 t, or 19 per cent, was dismissed by the EU and a different, lower catch total of **48,148 t** for Spain’s purse seine fleet was issued for 2017⁴.

According to Article 105 of Regulation (EC) No 1224/2009, when the European Commission has established that a member state has exceeded the quotas which have been allocated to it, the Commission shall operate deductions from future quotas of that Member State. The EU chose to deduct the significantly lower 2017 overcatch amount of 2,466 t from Spain’s future quotas.

Blue Marine Foundation would like to present the following questions to the EU:

- How does the EU explain the discrepancy in catch totals for 2017, given that the new system of allocating quota by vessel and calculating catch through landing reports and sale slips was only introduced in 2018?
- What is the status of the appended SGP document entitled *“Adoption of a new methodology to produce nominal catch statistics for the industrial tuna purse seine fleet of EU-Spain operating in the IOTC Area of Competence”*?
- Please can the EU explain: (a) whether the EU intends that IOTC CPCs should rely on this SGP document as an explanation for the issue (described above) raised by the WPTT; and (b) whether the EU agrees with the explanation provided in the appended SGP document?
- Has the rest of the EU fleet (specifically French and Italian-flagged vessels), in respect of 2018 catches of tropical tuna by its purse seine fleet, used T3 or, instead, used the same new reporting procedure as Spain as outlined in the appended SGP document?
- The appended SGP document states that: *“Once the SGP adopts the new system for the production of catch statistics, more work will be devoted to the preparation of other datasets, in particular catch-and-effort and catch-at-size, which at present should be considered preliminary.”* Please can the EU explain whether the SGP has already adopted the new system or, as suggested by the extract above, the SGP is still to adopt the new

³ As reported in the IOTC ‘Nominal Catch Database’ available here: <https://www.iotc.org/data/datasets>

⁴ The full amount in kg of 48 147 520 was reported on page 12 of the Official Journal of the European Union, the Commission Implementing Regulation (EU) 2019/479 of 22 March 2019, on ‘Operating deductions from fishing quotas available for certain stocks in 2018 on account of overfishing of other stocks in the previous years and amending Implementing Regulation (EU) 2018/1969’, available here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019R0479>

system? If it is the latter, why were the 2018 catch statistics provided to IOTC under the new system?

- The appended SGP document also states that: “... since 2017, Spanish purse seiners have refrained from fishing on free-schools, fishing almost exclusively on FADs. This may explain why the contribution of bigeye tuna to the total catch of tropical tunas has been higher in 2017 and 2018.” We have prepared the following table, which uses data from the IOTC’s ‘Catch-and-effort Database’⁵. It shows the proportion of catch by Spanish-flagged purse seine vessels arising from log-sets (i.e. FAD sets) for bigeye, skipjack and yellowfin tuna during the years 2016, 2017 and 2018.

Year	Fleet	Bigeye	Skipjack	Yellowfin
2016	Spain	90%	97%	75%
2017	Spain	64%	98%	67%
2018	Spain	94%	99%	96%

Please can the EU explain why the proportion of catch of bigeye tuna arising from FAD sets is at 90 per cent for 2016, then drops to just over 64 per cent for 2017 and then rises again to above 90 per cent for 2018? We ask that question because that pattern does not fit with the statement in the SGP document that fishing “almost exclusively on FADs” started in 2017.

Blue Marine Foundation would also like to present the following questions to the IOTC Compliance Committee:

- Does the Committee agree with the explanation of Spain’s 2018 catch discrepancy as provided by the SGP in the appended document entitled “*Adoption of a new methodology to produce nominal catch statistics for the industrial tuna purse seine fleet of EU-Spain operating in the IOTC Area of Competence*”?
- Which of Spain’s two yellowfin tuna catch totals for 2018 (i.e. 58,925 t or 46,991 t) will be adopted by the IOTC?

⁵ The IOTC ‘Catch-and-effort by month, species and gear, by vessel flag reporting country’ is available here: <https://iotc.org/data/datasets>



Adoption of a new methodology to produce nominal catch statistics for the industrial tuna purse seine fleet of EU-Spain operating in the IOTC Area of Competence

General Secretariat of Fisheries of Spain¹

Abstract

The General Secretariat of fisheries of Spain (SGP) is responsible for the monitoring of catches of all fishing vessels flagged in Spain, including those operating in the areas of competence of tuna-Regional Fisheries Management Organizations such as the Indian Ocean Tuna Commission (IOTC). This document responds to a request from the Working Party Tropical Tuna of the IOTC which, at its 21st Session, identified discrepancies in catch estimates for EU-Spain and was informed that they originated from changes in reporting procedures introduced by the Secretariat of Fisheries of Spain, applicable since 2018. The SGP has introduced those changes in order to follow EU Procedures for stocks subject to multi-annual plans, which call for EU member States to use data from landing reports and sale slips to monitor the utilization of quotas by individual vessels. The new system is based on landing reports and sale slips which are verified through inspection in port, carried out by inspectors under the SGP. The SGP consider that the catches recorded in such reports reflect more timely and accurately the retained catches of individual purse seine vessels, as opposed to previous catch estimates, which used a complex algorithm to raise catch estimates for scientific purposes. The SGP is currently evaluating the implementation of the new system and will inform the IOTC WPDCS regarding any future reviews to the system or time-series of catch for the Spanish fleet, as deemed appropriate.

Background

The Secretariat of fisheries of Spain (SGP) is responsible for the monitoring of catches of all fishing vessels flagged in Spain, including those operating in the areas of competence of tuna-Regional Fisheries Management Organizations such as the Indian Ocean Tuna Commission (IOTC). This document responds to a request from the Working Party Tropical Tuna of the IOTC which, at its 21st Session, identified discrepancies in catch estimates for EU-Spain and was informed of changes in reporting procedures introduced by the Secretariat of Fisheries of Spain, applicable initially since 2018.

The Spanish purse seine fleet have been operating in the Indian Ocean since 1984. Since its arrival, the fleet has complied with Regional, EU and flag state regulations concerning the monitoring and control of its activities and production and reporting of estimates of catch and other datasets requested by the Commission.

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Until 2017, the Spanish Government used logbook and landing statistics to produce estimates of total catch for each individual vessel trip, with the catches of yellowfin tuna and bigeye tuna of more and less of 10kg round weight reported separately. The catches recorded in logbooks under each size category and for each set during a trip were then broken by species using proportions by species obtained from data collected through sampling in port, through a complex catch estimation algorithm. This meant that the samples used to correct the catches of each individual set for a given vessel trip came from many different vessels, regardless of purse seine flag or size.

While the EU and Seychelles changed their sampling and stratification procedures in 1998 (Pallarés & Hallier, 1997; Pianet *et al.*, 2000), the underlying basis for the estimation remained the same, with catches for each individual purse seine set corrected using proportions coming from samples originating from all available samples from vessels that operated in the same stratum where that set occurred (each stratum referring to a large area and quarter), regardless of the flag of the vessel (Spain, France or Seychelles) or of whether samples were available for the vessel concerned. This means that, while the system could be useful to obtain estimates of catch in bulk, for the combined purse seine fleet, it cannot be used to monitor the utilisation of quota at the individual vessel level. In addition, the system cannot be used to monitor quota utilization in near real time, as catches are estimated at the end of each quarter (due to the type of stratification used).

The estimation procedures previously used by France, Spain and Seychelles, generally referred to as T3, are currently under review. The main reason is potential biases that have been identified when comparing estimates from T3 for each individual vessel against data from sale slips collected on EU-Spain and Seychelles purse seiners both in the Atlantic and Indian oceans (Herrera & Báez, 2019); and through the analysis of stratification and catch estimation procedures, which tend to confirm that current estimates of catches of tropical tunas might be subject to various types of bias (Duparc *et al.*, 2018, 2019a,b).

Since 2017, the Indian Ocean yellowfin tuna stock has been subject to an interim Rebuilding Plan (IOTC Resolution 19/01 at present). In 2017, the SGP noted a discrepancy between the catch reports originating from Spanish purse seiners (sale slips) and estimates obtained using T3. In order to maintain the consistency of estimates, the SGP decided to report scientific estimates and data from landing reports for that year. This was also possible because the SGP monitored the implementation of the yellowfin tuna quota in bulk, as purse seiners were not assigned individual quotas during that year. However, in 2018 the SGP adopted Individual Vessel Quotas which for the reasons indicated in the previous paragraphs cannot be monitored using T3. It was then decided to use sale slips for the control of quota utilization by Spanish purse seine vessels.

New method used to produce estimates of nominal catch for Spanish purse seiners

In 2018, the SGP adopted a new system to estimate nominal catches of tropical tunas, which is based primarily on Council Regulation (EC) No 1224/2009 *establishing a*



Community control system for ensuring compliance with the rules of the common fisheries policy (Anon. 2009). Appendix 1 includes provisions of the referred Regulation which are relevant to the control of stocks subject to a multi-annual plan.

The method implemented by the SGP for 2018 relies on the sale slip data reports available, which cover all the unloadings of tuna corresponding to fishing sets made by Spanish purse seiners over the year 2018. This is in line with provisions in Council Regulation (EC) No 1224/2009. It is important to highlight provisions in the following Articles:

Articles 14 & 15: Obligation to keep a logbook in which to record catches of all species kept aboard above 50kg of live-weight equivalent with a margin of tolerance of 10% for all species retained on board. And completion and transmission of logbook data through electronic means.

Articles 23 & 42: Completion of landing and transshipment (in port) declarations for all species unloaded or transhipped from the vessel.

Article 60: Weighing of fishery products on landing, prior to the fisheries products being held in storage, transported or sold. And use of the figure resulting from the weighing for the completion of landing declarations, transport document, sales notes and take-over declarations.

Article 62: Submission of sale slips within 48 hours after the first sale, where possible in electronic format.

Article 74: Carry out inspections to verify the legality of the catch kept on board, stored, transported, processed or marketed and the accuracy of the documentations or electronic transmissions relating to it.

All Spanish flagged purse seiners carry onboard an electronic logbook, known as the DEA (Diario Electrónico de A bordo). Data on all fishing sets and activities is reported in near-real time to the SGP (DEA1). In addition, data from landing and transshipment in port are reported electronically, through the same system (DEA2).

According to the Regulations in place, the difference between logbook catch reports and landing declarations cannot exceed 10% for all species whose retained catch is over 50kg. In addition, the amounts recorded in landing declarations and sale slips must be the same. The SGP Control Agency monitors the consistency of reports and shipowners are controlled on that basis, with penalties established according to the regulation, where appropriate.

In addition to the above, the SGP has concluded an Inspection Protocol that has been implemented to control the catches of yellowfin tuna unloaded in ports of the Indian Ocean. So far, a team of inspectors from the SGP has been based in Seychelles, carrying out inspections of Spanish purse seine vessels in port, at unloading. The team might move to other ports as unloading activities increase in those ports, according to the seasonality of the fishery.



Next steps

In order to validate the new system implemented, the SGP is collating all landing data and information on inspections. The results of these inspections will be used to validate landing declarations, and also compared to estimates obtained using T3 for those trips. The results of this work will inform future adjustments to the monitoring system, as required.

While the SGP acknowledges the concerns expressed by the WPTT that the proportion of bigeye tuna reported by Spain for 2018 differs markedly from that recorded in previous years, it should be noted that the catches reported for 2018 were not obtained using T3, for the reasons explained above. A preliminary evaluation of the sale slip data collected by the SGP over the period 2014-2018 showed that the proportions of bigeye tuna in sale slips reported by Spanish purse seiners is higher than that estimated using T3. This is presented in Table 1. It is also important to note that, since 2017, Spanish purse seiners have refrained from fishing on free-schools, fishing almost exclusively on FADs. This may explain why the contribution of bigeye tuna to the total catch of tropical tunas has been higher in 2017 and 2018.

Table 1. Amount (metric tons) of bigeye tuna reported on sale slips and estimated using T3, and proportion (%) that those catches represent over the total catches of tropical tunas, for purse seiners flagged in Spain, over the period 2014-2018

Year	2014	2015	2016	2017	2018
MT BET SALE SLIPS	11,802	10,519	12,785	24,146	26,174
%BET SALE SLIPS	8.7	8.6	9.1	12.5	12.8
MT BET T3	8,988	9,832	9,371	12,345	<i>na</i>
%BET T3	7.1	8.6	7.1	8.2	<i>na</i>

As indicated above, the SGP is collating additional information to validate the new system and will decide if future revisions of the estimates or time-series are required, according to the results of this work. At present, SGP is evaluating the eventual sources of discrepancies that could be related to change on fishing patterns, catch estimates or a combination of both.

Once the SGP adopts the new system for the production of catch statistics, more work will be devoted to the preparation of other datasets, in particular catch-and-effort and catch-at-size, which at present should be considered preliminary.

Conclusion

TAC and quota systems, catch limits, or similar regulations, may lead to significant changes in the way fisheries operate. In the case of industrial tuna purse seine fisheries in the Indian Ocean, Spanish scientists have documented changes in the fishery following the adoption of catch limits for yellowfin tuna (Báez & Ramos, 2019). The main changes reported referred to purse seine skippers refraining from catching free-swimming schools of yellowfin tuna, to avoid reaching the yellowfin catch limit too soon. This operational change in the behaviour of the fleet resulted in an inflection point in the trends from time series (Báez & Ramos, 2019). In addition, while fishing mostly on FADs all purse seine fleets seem to have been avoiding large concentrations of juvenile yellowfin tuna on FADs, as the contribution of skipjack and/or bigeye tuna to the total catches on FADs has increased considerably since the implementation of the catch limit (IOTC 2019).

The SGP consider that the catches recorded in landing reports and sale slips reflect more timely and accurately the retained catches of individual purse seine vessels, as opposed to previous catch estimates, which originated from a complex algorithm and could not be assigned to the individual vessel. In addition, at present monitoring in near real-time is only possible through landing reports and sale slips, as T3 cannot be used for this purpose.

The SGP is currently evaluating the implementation of the new system and will inform the IOTC WPDCS regarding any future reviews to the system or time-series of catch for the Spanish purse seine fleet, as deemed appropriate.

References

- Anon. (2009). 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.
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009R1224&from=EN>
- Báez, J.C., Fernández, F., Pascual, P., Ramos, M.L. & Abascal, F. (2017). Updating the statistics of the EU-Spain purse seine fleet in the Indian Ocean (1990-2016). Submitted to 19th Working Party on Tropical Tunas (WPTT19), IOTC. IOTC-2017-WPTT19-INFO5
- Báez, J.C., Fernández, F., Pascual, P., Ramos, M.L. & Abascal, F. (2018). Updating the statistics of the EU-Spain purse seine fleet in the Indian Ocean (1990-2016). Submitted to 20th Working Party on Tropical Tunas (WPTT20), IOTC. IOTC-2018-WPTT20-15.
- Báez, J.C. & Ramos, M.L. (2019). Free school fishery trends for Spanish tropical purse seiners in the Indian Ocean. IOTC-2019-WPTT21-12.
- Duparc, A., P. Cauquil, M. Depestris, P. Dewals, D. Gaertner, A. Hervé, J. Lebranchu, F. Marsac, and P. Bach. 2018. Assessment of accuracy in processing purse seine



- tropical tuna catches with the T3 methodology using French fleet data. Pages 1–19 Report of the 20th session of the IOTC Working Party on Tropical Tunas. IOTC, Victoria, Seychelles.
- Duparc, A., V. Aragno, M. Depetris, L. Floch, P. Cauquil, J. Lebranchu, D. Gaertner, and P. Bach. 2019a. Assessment of the species composition of major tropical tunas in purse seine catches: a new modelling approach for the Tropical Tuna Treatment processing. Case of the French fleet in Atlantic Ocean. Tropical Tuna Species Group Meeting.
- Duparc A., Aragno V., Depetris M., Floch L., Cauquil P., Lebranchu J., Gaertner D., Marsac F., Bach P. (2019b). Assessment of the species composition of major tropical tunas in purse seine catches: a new modelling approach for the tropical tuna treatment processing, Case of the French fleet in Indian Ocean. IOTC-2019-WPTT21-10
- Herrera, M. & Báez, J.C. (2019). On the potential biases of scientific estimates of catches of tropical tunas of purse seiners the EU and other countries report to the ICCAT and IOTC. Vol. Sci. Pap. ICCAT 75 (7) (2019) 2202-2232.
- IOTC 2019. IOTC Nominal Catch data presented to the 21st Meeting of the Working Party on Tropical Tunas of the Indian Ocean Tuna Commission. Extracted on 29 October 2019. <https://iotc.org/WPTT/21/Data/03-NC>
- Pallarés, P. & Hallier, J.-P. (1997). Analyse du schéma d'échantillonnage multispécifique des thonidés tropicaux (Rapport scientifique No. Programme no 95/37). IEO/ORSTOM.
- Pianet, R., Pallarés, P. & Petit, C. (2000). New sampling and data processing strategy for estimating the composition of catches by species and sizes in the European purse seine tropical tuna fisheries. In: IOTC Proceedings IOTC No. 3, pp. 104–139.



APPENDIX I: Extract from COUNCIL REGULATION (EC) No 1224/2009

Provisions in COUNCIL REGULATION (EC) No 1224/2009 which are relevant to the implementation of catch controls for stocks subject to a multi-annual plan, as it is the case with the stock of yellowfin tuna in the IOTC Area of Competence (bold font from author):

(17) Member States should monitor the activities of their fishing vessels in and outside Community waters. To facilitate effective monitoring masters of Community fishing vessels of 10 metres' length overall or more should be obliged to keep a **fishing logbook and submit landing and transhipment declarations**. In order to make use of modern technologies, for fishing vessels of 12 metres' length overall or more, the **fishing logbook should be in electronic form** and the **landing and transhipment declarations should be submitted electronically**.

(18) The information contained in the fishing logbooks of fishing vessels should be verified at the time of landing. Accordingly, those involved in the landing and marketing of fish and fishery products **should be required to declare the quantities landed, transhipped, offered for sale or purchased**.

(24) Particular measures should apply in case of multiannual plans as a particular form to protect the concerned stocks. Transhipments of catches of stocks subject to a multiannual plan should be allowed only in designated ports and **only if these catches have been weighed**.

(29) To ensure that all catches are properly controlled Member States should ensure that all fisheries products are first marketed or registered at an auction centre or to registered buyers or to producer organisations. As the exact weight of catches needs to be known to follow the utilisation of quotas, Member States should ensure that all fisheries products are weighed unless sampling plans based on a common methodology are in place.

(30) In order to follow the way of the catch and to be able to verify their coherence with catch data, registered buyers, registered auctions or other bodies or persons authorised by Member States **should submit sales notes**. If they have an annual turnover in first sales of fisheries products of more than EUR 200 000 **the sales notes should be transmitted electronically**.

(34) The concept and the tasks of control observers should be clearly established for future control observer schemes. At the same time rules should also be established on the conduct of inspections.

Article 14 Completion and submission of the fishing logbook

1 Without prejudice to specific provisions contained in multiannual plans, masters of Community fishing vessels of 10 metres' length overall or more shall **keep a fishing logbook of their operations, indicating specifically all quantities of each species caught and kept on board above 50 kg of live-weight equivalent**.



3 The permitted margin of tolerance in estimates recorded in the fishing logbook of the quantities in kilograms of fish retained on board shall be 10 % for all species.

Article 15 Electronic completion and transmission of fishing logbook data

1 Masters of Community fishing vessels of 12 metres' length overall or more shall record by electronic means the information referred to in Article 14, and shall send it by electronic means to the competent authority of the flag Member State at least once a day.

Article 21 Completion and submission of the transhipment declaration

1. Without prejudice to specific provisions contained in multiannual plans, masters of Community fishing vessels of 10 metres' length overall or more involved in a transhipment operation **shall complete a transhipment declaration**, indicating specifically all quantities of each species transhipped or received above 50 kg of live-weight equivalent.

Article 23 Completion and submission of the landing declaration

1. Without prejudice to specific provisions contained in multiannual plans, the master of a Community fishing vessel of 10 metres' length overall or more, or his representative, shall **complete a landing declaration, indicating specifically all quantities of each species landed**.

Article 42 Transhipment in port

1. Fishing vessels engaged in fisheries subject to a multiannual plan shall not tranship their catches on board of any other vessel in a designated port or in places close to the shore unless they have been weighed in accordance with Article 60.

Article 60 Weighing of fishery products

1. **A Member State shall ensure that all fishery products are weighed on systems approved by the competent authorities** unless it has adopted a sampling plan approved by the Commission and based on the risk-based methodology adopted by the Commission in accordance with the procedure referred to in Article 119.

2. Without prejudice to specific provisions, the weighing shall be carried out on landing prior to the fisheries products being held in storage, transported or sold.

4. Registered buyers, registered auctions or other bodies or persons which are responsible for the first marketing of fisheries products in a Member State shall be responsible for the accuracy of the weighing operation unless, in accordance with paragraph 3, the weighing takes place on board a fishing vessel, in which case it shall be the master's responsibility.



5. The figure resulting from the weighing shall be used for the completion of landing declarations, transport document, sales notes and take-over declarations.

Article 62 Completion and submission of sales notes

1. Registered buyers, registered auctions or other bodies or persons authorised by Member States with an annual financial turnover in first sales of fisheries products of less than EUR 200 000 which are responsible for the first marketing of fisheries products landed in a Member State, **shall submit, if possible electronically, within 48 hours after the first sale, a sales note to the competent authorities of the Member State in whose territory the first sale takes place. The accuracy of the sales note shall be the responsibility of these buyers, auctions, bodies or persons.**

Article 74 Conduct of inspections

1. Member States shall set up and keep up to date a **list of officials responsible for carrying out inspections.**

3. **Officials shall check** in particular:

(a) **the legality of the catch kept on board, stored, transported, processed or marketed and the accuracy of the documentations or electronic transmissions relating to it;**