





MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT NATIONAL AGENCY FOR FISHERIES AND AQUACULTURE

ANNUAL REPORT

on efforts to achieve a sustainable balance between fishing capacity and fishing opportunities for the year 2020

ROMANIA

pursuant to the Article 22 of the Regulation (EU) no 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC

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Introduction

Article 22 of Council Regulation (EC) No. 1380/2013 provides for the submission of Annual report by the Member States on efforts to achieve a sustainable balance between fishing capacity and fishing opportunities of their one commercial fleets. The Annual Report corresponds to the structure required elements of "Guidelines for the analysis of the balance between fishing capacity and fishing opportunities according to Art 22 of Regulation (EU) No 1380/2013 of the European Parliament and the Council on the Common Fisheries Policy amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC.

A. Description of the fishing fleets in relation to fisherics: developments during the previous year, including fisheries covered by multiannual management or recovery plans

A. 1. Description of fleets

The Romanian fishing fleet is operating in the area of competence of the Regional Fisheries Management Organization - G.F.C.M., Area 37 - Mediterranean and Black Sea, Sub-area 37.4., Division 37.4.2, GSA 29, along the Romanian coastline and is limited to the marine waters' areas up to 60-70-meter isobaths, exclusively in the EEZ.

Starting with 2013, fishing activities of Rapa Whelk concentrated on two main catching technics: on the manual harvesting, but also with mechanized beam trawl, has led on changes to other vessels with 12-18 m and 18-24 m increased number. These vessels are equipped with new technic facilities, stationary gears (gillnets, longlines, etc.) and trawls (pelagic trawl or beam trawl). The total number of recorded vessels in 2013 was 194 of which only 112 were active 58%. The share of vessels in length segments was as follows: 84 % 06-12m boats, 13% boats 00-06m, 3% 12-18m vessels and 1% 24-40m vessels. Total landings in 2013 was increase up to 1,617.354 kg.

In 2014, the share of the segment of 06-12 m small boats have been kept constant, but the share of 12-18 m increased 7 %, due to the switching of fishermen towards the mechanized exploitation of the Rapa whelk, the 24-40m vessels has remained constant and the 00-06m has suffered a slight reduction 10 %. The total landings in 2014 were 2.199.519 kg and value 2.468.147 euro. It has recorded an increase in the level of catches by fishing segments for vessels with the length of 12-18 m; the catches on the segment length of 24 - 40 m vessels were kept approximately constant at the level of 2013.

In the year 2015, there were registered 151 small boats and vessels of which 127 active and 24 inactive. Should be underlined a decrease in the number of small boats between 00 - 12 m, respectively an increase of the number of vessels with a length of more than 12 m. A progressive increase is still recorded number of vessels 12 - 18 m. Total landings in 2015 was 4,842.573 kg and value 4.282.353 euro. Excluding the capture of the small boats segment 00-06m and 06-12m length, it's observed that of the total catches was achieved by vessels with lengths greater than 12 m.

In 2016, the number of total recorded vessels was lower by 4 units than 2015 year. From the 147 vessel numbers, 121 were active 82 % and 26 were inactive 18 %. The trend was still to reduce the number of vessels in the segments 00-06 m and 06-12 m and to increase the segments of vessels with length exceeding 12 m 10 %. An increase in the number of vessels in the segment of 12 - 18 m 10 % and a slight increase in the segment 24 - 40 m 2 % was observed. The total landings in 2016 were 6,839.443 kg and value 3,842.621 euro. With regard to registered share by length segments, the catches of the 12-18m were most important with 56% of the total landings. A slight increase was also registered in the segment 24-40 m, 15%, while the segment that was dominant until 2014 had a share of only 23%.

The number of total vessels in 2017 as structure, comprises: 155 total number of vessels, of which 135 active vessels 87 % and 20 inactive, less than 13 %; 87 % of vessels in FFR were active, indicating an increase of quality management measures on the application of Action Plan measures in the past two years, 2016/2017. The share of active vessels in length segments was as follows: 74 % 06-12m boats, 10 % boats 00-06m, 12% 12-18m vessels, 1 % 18-24 m and 3% 24-40m vessels. The total landings in 2017 were 9.553.182 kg and value 4.520.497 euro.

The number of total vessels in 2018, as structure, comprises: 167 total number of vessels, of which 136 active vessels and 31 inactive 81 % of vessels in FFR were active, indicating an increase of quality management measures on the application of Action Plan measures in the last years.

The share of vessels in length segments was as follows: 75 % 06-12m boats, 11 % boats 00-06m, 11% 12-18m vessels, 1 % 18-24 m and 2% 24-40m vessels. The total landings in 2018 were 7.744.996 kg and value 4.161.657 euro.

The number of total vessels in 2019, as structure, comprises: 162 total number of vessels, of which 138 active vessels and 24 inactive; 85 % of vessels in FFR were active, indicating an increase of quality management measures on the application of Action Plan measures in the last years. In analyzing for information, the 2019 fleet structure is shown in Annex 1 the share by length classes segments was the following: 73 % small boats between 06-12 m, 14% vessels of 12-18m, 10% between 00-06 m, 2 % vessels of 24-40 m and 1 % 18-24 m. see Annex 1. The total landed in 2019 was 7.149.381 kg. Rapa whelk (RPW) is the characteristic species influenced at most the actual structure of fishing activities and effort deployed. The total landings in 2019 were 7,149,381 kg and value 4,353.346 euro. Tabel 4.

In 2020 The number of total vessels, as structure, 175 total number of vessels, cu 1619.95 GT and 6277.83 kW of which 131 active vessels 75 % (1544.74 GT and 6155.12 kW), and 44 inactive 25 %, (75.21 GT and 122.71 kW), there is an increase in the number of inactive boats due to the covid pandemic.

In analyzing for information, the 2020 fleet structure is shown in Table 1, 2, the share by length classes segments was the following:

75 % small boats between 06-12 m, 93 vessels active and 38 inactive, 12% vessels of 12-18m, 21 vessels active, 10% between 00-06 m, 12 vessels active and 6 inactive, 2 % vessels of 24-40 m - 4 vessels active and 1 % 18-24 m 1 vessels. See Annex 1.

The total landed in 2020 was 4.462.905 kg and value 2.771.775 euro. Rapa whelk (RPW) is the characteristic species influenced at most the actual structure of fishing activities and effort deployed.

Romania's fleet in 2020 recorded the highest number of inactive boats, a number of 44 with an increased value of 83.33% compared to 2019 due to the combined effects of the decline in demand and supply chain disruption resulting from the health crisis COVID-19.

The fishing industry has been severely affected by the COVID-19 pandemic, as demand has fallen sharply, Rapa Welk accounts for more than 90% of Romania's total catch and final buyers are Southeast Asian companies that have stopped importing.

The fall in demand and the subsequent fall in prices at the first sale caused the ships to cease operations because they were no longer profitable. In addition to these supply and demand problems, sanitary measures are also added (distance between crew members at sea, restrictions on the transport of fishermen and buyers).

The closure of HORECA (hotels, restaurants and cafes) had a significant impact on the activity of the fishing fleet, especially for the segments of the fleet targeting high value species and small-scale fishing, which tried to maintain a limited activity in order to keep a new balance between supply and reduced demand.

Fishermen, retailers and processors also face limited storage capacity (eg. freezers).

In the analyzed period 2013-2020, it was observed that the highest number of vessels was registered in 2013 with 14.82% of the total period, followed by 2020 with 13.37%. Regarding the gross tonnage, there is an increase starting with 2013 of 6.48%, reaching a maximum in 2020 of 17.16%. Starting with 2016, the replacement of small vessels with powerful engines that could not be equipped with TBB with boats larger than 12 m began (on 31.12.2020 there were in the fleet a total of 26 vessels, with 1241.31 GT and 4452.38 kW) between these, 21 vessels were in the 14-15 m segment with 695.31 GT and 3051.13 kW, 1 vessel in the 18-24 m segment (70 GT and 184 kW) and 4 vessels in the 24-40 m segment (476 GT, 1217.25 kW), see Annex 1.

Table 1. Structure of the Romanian fleet in 2020 by fleet segments, fishermen and vessels number, length classes, average age, GT and kW

Length class (m)	Total vessels	Share of the total vessel (%)	Fishing techniques	Average length	Average age	Total GT	Total kW	Total fishermen
VL 00-06	12	6.86	PG *	5.11	12.73	10.71	165.08	25
VL 06-12	68	38.86	PG	7.70	21.97	131.55	668.92	164
VL 06-12	25	14.29	PMP*	9.06	13.04	161.17	868.74	. 94
VL 12-18	21	12	PMP	14.85	9.86	695.31	3051.13	84
VL 18-24	1	0.57	PMP	20.2	21	70	184	4
VL 24-40	4	2.29	PMP	25.75	31	476	1217.25	16
VL 00-06	6	3.43	inactive	5.31	17.57	5.44	10	1
VL 06-12	38	21.71	inactive	7.86	18.53	69.77	112.71	-
Total	175					1619.95	6277.83	387

PG * vessels using only stationary fishing gears; PMP* vessels using both, active and stationary fishing gears

Despite the fact the small vessels 06-12m are taking the largest share 75 %, as number of the GT 18.94 % and kW of its are very low 24.98 %, 12 % correspond for the length vessel segment 12-18 m as number, but for 42.92% as GT and 48.60 as kW, the most important share in the fleet. The segment is the most important, followed by: 2.30 % 24-40m segment with 29.38 % GT and 19.39 %, and 10 % 00-06m segment with GT 0.69 % and kW 2.68 % from total fleet capacity - see Table 2.

Table 2. Structure of the Romanian fleet in 2020 in % by fleet segments as GT and kW

	Fleet segments e and inactive vessels)	GT	Share Total GT %	kW	Share Total kW %
	00 - 06 m PG	10.71	0.66	165.08	2.63
	06 - 12 m PG	131.55	8.12	668.92	10.66
Active	06 - 12 m PMP	161.17	9.95	868.74	13.84
Active	12 - 18 m PMP	695.31	42.92	3051.13	48.6
	18 - 24 m PMP	70	4.32	184	2.93
	24 - 40 m PMP	476	29.38	1217.25	19.39
TOTAL Act	ive	1544.74	95.35	6155.12	98.05
To a ation	00 - 06 m	5.44	0.34	10	0.16
Inactive 06 - 12 m		69.77	4.31	112.71	1.80
TOTAL Ina	TOTAL Inactive		4.65	122.71	1.96
Л	TOTAL FLEET			6277.83	

As it could be seen from the Table 2, Annex 1 very low percentage of 4.65 % as GT and 1.96 % as kW, is not used, from the total fishing capacity achieved, according to the number of vessels in Fishing Fleet Register at 31.12.2020, a very low percentage, all most negligible.

It conducts to the conclusion that in 2020 total fleet capacity has very good percentage of use, corresponding to 95.35 % for GT and 98.05 % for kW. Comparative with 2019 year it remains all most constant.

A.2. Link with fisheries

The current status of fishing in Romania is similar to the last 2 years (2018 and 2019), the fishing activities being carried out only in the waters of the Black Sea under Romania jurisdiction.

There are no fishing activities in other regions or catches of other species than in the area of Romania. A total of 21 different species were landed in 2020 counting for significant catches.

Table 3 shows the main catches, divided by the total landings recorded, with a major importance are: 92.22% is Rapa whelk, 2.62% mussels, 1.61% anchovy and 1.57% turbot, in terms of value the main species is Rapa whelk with 63.85%, followed by turbot with 19.92%, 6.28% mussels, 2.67% anchovies, 2.26% bluefish and 1.88% horse mackerel.

Sprot registers a volume of 0.11% of the total landings with only 0.13% value and the shark that was caught accidentally not being quoted represented only 0.02% of the landings volume and 0.07% value.

Regarding the distribution by length classes regarding the volume of landings, VL1218PMP registers with 46.84% and 41.65% the value of landings, followed by the segment VL0612PMP with 29.86% volume and 27.73% value and the segment VL2440PMP with 16.06% volume, but the value is less than 11.53%.

During 2013-2020, the largest quantities landed (catch volume) in percentage of 21.51% and value in euros 16.24%, was registered in 2017, with a total number of active boats of 135 in the fleet segment VL12-18PMP, followed by 2018 with the volume of landings of 17.44% and only 14.95%, the value in euros, the value being lower than that achieved in 2017, 2019 and 2015, See Table 4.

In 2020, the volume of landings was only 10.05%, much lower than that recorded in 2017, 2018, 2019, 2015 and the value in euros 9.96 %, much lower than that achieved in 2017, 2019, 2015, 2018, 2016. The segment with the highest volume and value of landings was VL12-18 m followed by VL06-12m.

Tabel 3. Distribution of total landings by species in 2020 per fleet segment in total landings (kg) and value (euro)

Species / scientific name	Species COD/ kg/euro	VL0006 PG	VL0612 PG	VL0612 PMP	VL1218 PMP	VL1824 PMP	VL2440 PMP	TOTAL	Share in total landings kg (%)	Share in total Landings value euro (%)
0 10 1	TUR KG	0	28401	11066	26783.8	2105	1528	69883.8	1.57	-
Scophthalmus maeoticus	TUR EURO	0	224368	87421	211592	16630	12071	552082		19.92
Sprattus sprattus	SPR KG	10	4911.5	53				4974.5	0.11	
	SPR EURO	7	3438	37				3482		0.13
Rapana venosa	RPW KG	17258	3115	1223000	2036665	120295	715431	4115764	92.22	
	RPW EURO	7421	1339	525890	875766	51727	307635	1769778		63.85
Squalus	DGS KG	0	375	30	475			880	0.02	
acanthias	DGS EURO	0	825	66	1045			1936		0.07
Mytilus	MSM KG	30020		86883.5				116903.5	2.62	
galloprovincialis	MSM EURO	44730		129456				174186		6.28
Trachurus	HMM KG	7	21886.2	1398	3267	300		26858.2	0.60	
mediterraneus	HMM EURO	14	42459	2712	6338	582		52105		1.88
Engraulis	ANE KG	2323.1	63201.8	3056	3302	1		71882.9	1.61	
encrasicolus	ANE EURO	2393	65098	3148	3401			74040		2.67
Alosa immaculata	SHC KG	366	4213.1	90	 			4669.1	0.10	
	SHC EURO	1219	14030	300				15549		0.56
Alosa tanaica	CUI KG	30	2461.63		341			2832.63	0.06	
	CUI EURO	41	3348		464			3853		0.14
Gobiidae	GPA KG	252	8900.7	954	343			10449.7	0.23	
	GPA EURO	375	13262	1421	511			15569		0.56
Mesogobius	MBF KG	47	1130.5	5				1182.5	0.03	
batrachocephalus	MBF EURO	124	2973	13				3110	0.02	0.11
Chelon Auratus	MGA KG	110	328	90				528	0.01	
	MGA EURO	320	954	262			-	1536	0.01	0.06
Mullus barbatus	MUT KG	0	434.4	892	10598	70		11994.4	0.27	
	MUT EURO	0	843	1730	20560	136		23269		0.84
Atherinidae	ATB KG	0	952.6					952.6	0.02	
	ATB EURO	0	810					810	0.02	0.03
Pomatomus	BLU KG	129	2651	2391	8148	1565		14884	0.33	
saltatrix	BLU EURO	542	11134	10042	34222	6573		62513	0,53	2.26
Belone belone	GAR KG	20	1620.4	74	34222	0373			0.04	2.20
Delotte perotte	GAR EURO	65	5299	242		-		1714,4	0.04	0.00
Dasyatis	JDP KG		47		15		,	5606	0.10	0.20
pastinaca	JDP EURO	2528 5182	96	2825	15			5415	0.12	0.40
Dala danata			90	5791	31			11100	2.04	0.40
Raja clavata	RJC KG	333.5		34	247.2		,	614.7	0.01	
N-4	RJC EURO	484	207	49	358			891	0.51	0.03
Merlangius merlangus	WHG KG	0	397		108			505	0.01	
	WHG EURO	0	230		63			293		0.01
Solea solea	SOL KG	0	3.5					3.5	0.00	* * *
	SOL EURO	0	5					5		0.00
Dicentrarchus Iabrax	SRK KG	0	12					12	0.00	
	SRK EURO	0	62					62		0.00
Total kg		53434	145042	1332842	2090293	124335	716959	4462904		
Total euro		62917	390573	768580	1154351	75648	319706	2771775		
Share in total landings kg (%)		1.20	3.25	29.86	46.84	2.79	16.06			
Share in total Landing's va	alue euro (%)	2.27	14.09	27.73	41.65	2.73	11.53			

Tabel 4. Total landing volum (kg.) and value (euro) on vessels segments in the period 2013 - 2020

Year/kg/ price	VL0006 PG	VL0006 PMP	VL0612 PG	VL0612 PMP	VL1218 PMP	VL1824 PMP	VL2440 PMP	Total
2013 KG	139280	40446	106007	758728	334171	0	238722	1617354
2013 Euro	203074	24537	307529	448621	247535	0	206291	1437587
2014 KG	0	14281	107430	875352	911346	0	291110	2199519
2014 Euro	0	18175	281201	881381	953847	0	333543	2468147
2015 KG	35808	0	175017	1398005	1992717	219752	1021274	4842573
2015 Euro	55907	0	351411	1196361	1654856	171407	852411	4282353
2016 KG	17619	0	147681	1458395	3797154	360543	1058051	6839443
2016 Euro	28846	0	342528	855333	1882727	171939	561248	3842621
2017 KG	31512	0	104080	2582555	4834798	382405	1617832	9553182
2017 Euro	37872	0	334314	1232934	2082617	153557	679203	4520497
2018 KG	122043	0	97169	2558574	3582811	265620	1118779	7744996
2018 Euro	104526	0	335216	1402864	1710691	114217	494143	4161657
2019 KG	114893	0	116780	2216427	3427483	188357	1085441	7149381
2019 Euro	118838	0	348829	1321954	1906468	102422	554835	4353346
2020 KG	50572	0	147857	1330064	2093103	124350	716959	4462905
2020 Euro	57251	0	396143	762885	1160111	75679	319706	2771775

The following fishing gear was used to catch fish and mollusk species:

•VL0006PG: LHP, LLS, GNS, FPN, FPO •VL0612PG: GNS, FPN, FPO, LHP, LLS

•VL0612PMP: SB, TBB, GNS, LHP, LLS, FPO, FPN, PS, OTM

•VL1218PMP: GNS, OTM, TBB

•VL1824 PMP: TBB

•VL2440: OTM, GNS, TBB.

The vessels operate up to 30—35 marine miles out of shore. The climate conditions have a big influence on the presence of living aquatic resources in the area.

Fishing activity is seasonal because of the strict dependence of that specific conditions and the poor technical conditions of the fleet in general. It could be considered and concluded the fishing fleet activity is dependent on the TACs under EU regulation for turbot and sprat, and, also on Rapa whelk and mussels based on the stock abundance.

As mentioned above the abundance during the fishing season, offers better opportunities for fishermen. The other significant conclusion is the national fleet is 100 % dependent of catches in waters under national jurisdiction of Romania, due to the limited capacity for navigation of the vessels.

A.3. Development in fleet

The development of the Romanian fishing fleet from 31 December 2013 to 31 December 2020 is presented in Table 5, Annex 1. As can be seen, the number of vessels registered in 2020 decreased by only 10%, compared to the data from 31 December 2013. In general, the Romanian fishing fleet increased in terms of tonnage by 62 %, the engine power remained constant. There is a substantial decrease on the VL0006m segment followed by the VL0612m segment and a significant increase is observed in the VL1218 m and VL2440m segments (both for ships and for tonnage and power).

If we compare the year 2020 with 2019, we notice only a decrease on the fleet segment VL1218m and an increase in the number of vessels on the segment VL0612m.

Tabel 5. Development in Romanian fleet between 2013-2020, and the trend of 2020 compared to 2013 and 2019

	,	VL000	6		VL061	2		VL121	8		VL18	324		VL24	40		TOTA	L
Year	VsI	GT	KW	Vsl	GT	ĸw	Vsl	GT	_ KW	Vsi	G T	KW	Vsl	GT	_ ĸw	Vsl	GT	ĸw
2013	25	14,77	345	152	237.5	3740.3	5	119.6	1086	0	0	0	2	240	1111.6	194	611.87	5282.9
2014	16	11.27	234	129	223.21	2559.27_	11	314,6	2205	0	0	0	2	240	1111,6	158	789.08	6109,87
2015	16	11.94	212	121	211.02	2131.17	11	340.37	2305	1	70	272,1	2	240	1111.6	151	873.33	6031.83
2016	14	10.42	194,19	115	227.66	1554,02	14	441.9	2493,3	1	70	272,1	3	359	1332.25	147	1108.98	5845.82
2017	16	12.3	194.19	115	232.42	1216.87	19	616.41	3300.41	1	70	272.1	4	476	1217.25	155	1407.13	6200.78
2018	18	14.03	97,91	125	311.25	1744.9	19	601.17	3004.57	1	70	184	4	476	1217.25	167	1472.45	6248.63
2019	17	12.87	9 7.91	118	293,64	1444.81	22	707.25	3291, 26	ı	70	184	4	476	1217.25	162	1559.76	6235,23
2020	18	16.15	175.08	131	362.49	1650.37_	21	695.31	3051.13	1_1	70	184	4	476	1217.25	175	1619.95	6277.83
Trend 2020 to 2013	-28%	9%	-49%	-19%	53%	-56%	76 %	83%	64%	0	0	0	50 %	52 %	9%	-10	62%	0
Tyend 2020 to 2019	6%	25%	79%	11%	23%	14%	-5%	-2%	-7%	0	0	0	0	0	0	8%	4%	1%

B. Impact of fishing effort reduction schemes on fishing capacity

B.1. Statement of effort reduction schemes

At national level in 2020, the temporary cessation of fishing included a total of 168 days of restrictions for the entire fleet targeting shark, goby and turbot (for the breeding period) and were as follows:

- 1. Fishing of sharks, for a period of 77 days, between March 15 and April 15 and between October 15 and November 30;
- 2. Fishing for gobies, for a period of 31 days, between April 15 and May 15;
- 3. Turbot fishing for a period of 60 days, between April 15 and June 15;

The Annual Order establishes the periods and areas of fishing prohibition, as well as the areas of protection and biological restoration of living aquatic resources. The effect of Covid effort management and pandemic was a -19% reduction in the number of fishing days in 2020 in the fleet compared to 2019. See table 6, the highest reduction was recorded in the VL0612PMP fleet segment with -42%, followed of the VL0006PG segment with - 37%.

Tabel 6. Effort reduction during the period 2018-2020 and the trend of 2020 compared to 2019 and 2013

		Fishing days								
Fleet segment	2013	2014	2015	2016	2017	2018	2019	2020		2020 to 2013
VL0006PG	438	0	0	231	188	433	537	336	-37%	-23%
VL0006PMP	82	166	307	0	0	0	0	0	0	0
VL0612PG	1376	1458	1515	1150	1331	1357	1592	1471	-8%	7%
VL0612PMP	467	558	987	1194	1744	1807	1215	709	-42%	52%
VL1218PMP	137	379	605	839	1001	1156	1186	1117	-6%	715%
VL1824PMP	0	0	33	68	102	85	71	65	-8%	0
VL2440PMP	200	174	234	265	404	296	306	259	-15%	30%
Total	2700	2735	3681	3747	4770	5134	4907	3957	-19%	47%

B. 2. Impact on fishing capacity of effort reduction schemes

In the period of the application of previous EFF measures "Permanent cessation of fishing activities" conducted, to scrapping operation financed with funds from the EFF, that started in the second half of July 2010 and ended in the first half of December 2013, leading to a scrapping procedure of 16 vessels in the segments: VL06-12 = 10 vessels, VL12-18m = 1 vessel, VL18-24m = 1 vessel and VL24-40m = 4 vessels. All these vessels totalized a capacity of 596,43 GT, and 1796,85.

The impact of these measures conducted to an improved ratio of fishing capacity utilization as it stated above with less capacity in tons of 288.05 GT and kilowatt 78.17 kW. See table 7.

The multiannual management plan to eliminate IUU in Turbot fishery of Black Sea

The GFCM, as the RFMO in the region, and EU Commission adopted the Recommendation GFCM 39/2015/3, amended by Recommendation GFCM/41/2017/4 on a multiannual management plan for turbot fisheries in the Black Sea in order to reduce, at least, the IUU fishery for Turbot species in the Black Sea, compulsory for Bulgaria and Romania, as EU and GFCM MS, and Turkey as GFCM member, but which is not so compulsory for the other 3 riparian countries Ukraine and Georgia, and Russian Federation.

The application of this management plan for Romania was to address the, corresponding to the quota allocation approved each year through EU Regulation. Under the EFCA guidance the plan conducted to a reduced number of irregularities on Romania fleets, timely evaluated by the inspectors of EFCA. This plan includes a special operation of common inspections of Romania and Bulgaria, and dedicated landings points for Turbot, inter alia.

A spatial-temporal closure of fishery for two months - minimum 60 days, was adopted and strictly monitored, during the fishing season on the Turbot spawning period. In Romania this period is 15 April - 15 June each year in its territorial waters. As a consequence, the stock assessment showed a slight increase of biomass in 2017/2018 for Turbot, allowing both, GFCM and EC, to increase the TACs catches up to 75 tones, for 2020 recognizing the positive results achieved by Romanian authorities on the managing plan at national level for this fishery. The UE regulations aplied for 2020 and 2021 established a TAC for turbot of 75 to.

Actions of IUU fight in Turbot fishery included the supervision of all area of Romania

Based on Commission Implementing Decision (EU) 2018/1986 of 13 December 2018, Organization starting from 01 January 2019, was implemented the specific control and inspection program for fishing activities using stocks or species that make up subject to multiannual plans, for fishing activities exploiting species subject to the landing obligation pursuant to Article 15 of Regulation (EU) No 182/2011. 1380/2013 and for certain fishing activities exploiting stocks or species that are subject to conservation and management measures adopted by regional fisheries management organizations.

Within the specific control and inspection program (SCIP) joint inspection and control activities (JDP) are carried out together with the inspectors from Bulgaria under the coordination of EFCA. Due to the COVID 19 pandemic period, the joint activities were carried out online under the coordination of EFCA. Between June and August 2020, the joint MMO 2020 exercise took place, coordinated by FRONTEX with the participation of EFCA and EMSA with the aim of identifying illegal fishing activities.

No relevant illegal activities carried out by third country fishing vessels or fishing vessels in the national fishing fleet were identified during exercise.

C. Statement of compliance with entry/exit scheme and with level of reference

According to the provisions of Common Fisheries Policy and the fleet capacity ceiling which was established in the Annex II of Regulation (EU) 1380/2013, Romania is respecting the fishing capacity according, as established.

According to these provisions, the management measures of the entry/exit regime used in 2020, Romania fulfilled its commitments related to the ceiling levels, namely the actual total GT is 1619.95 tons and engine power is 6277.83 kW, lower to the maximum levels of 1908 GT and 6356 kW, as per regulation.

As mentioned above, Romania is acting in respect of entry/exit scheme under the ceiling level, both KW and GT, as set in the regulation. Prior to accession, there were no capacity ceilings and is shown in the Table 7 bellow.

Each entry (or increase in tonnage or engine power) in the fleet register has been accompanied by the at least the same quantity withdrawal from the fleet. So, Romania can guarantee that the national fleet capacity in tonnage (GT) and (kW) is equal or less than the referent level at the date of the accession in EU, in line with article 23 of Regulation 1380/2013.

Compared to 2019, in 2020 we had a slightly increased value for the total number of vessels by 7.43% and for the gross tonnage of 3.72% GT and an insignificant increase for kW by only 0.68% kW.

In 2020, 3 vessels left the fleet (21.36 GT and 101.57 kW), average length 8.65 m, average age 12.35 years, out of which: VL00-06 = 1 vessel (0.9 GT and 0 kW), VL06-12 = 1 vessels (1.55 GT and 29.44 kW), VL12-18 = 1 vessel (18.91 GT and 72.13 kW).

16 vessels entered to the fleet, totalizing (85.37 GT and 144.42 kW), having average length 8.29 m, average age 15 years, segments: VL00-06=2 vessel (4.18 GT and 29.42 kW), VL06-12 = 13 vessels (58.08 GT and 0 kW), VL12-18 = 4 vessels (23.11 GT and 115 kW).

At the end of 2020, there were 175 vessels in the fishing fleet, with a total capacity of 1619.95 GT and 6277.83 kW, as per Table 7, according to the max capacity under Regulation (EU) 1380/2013.

The conclusion is that the management of the fishing fleet capacity, is not exceeding levels of the fleet capacity reported in 2019 - see Table 7.

Table 7. Fleet capacity of Romania operating in the Black Sea at 31.12.2020

	GT	KW
Reference level as at 1 January 2007	2315	7473
Status of fleet as at 1 January 2007	2504	8153
Reference level as at 31 December 2020	<u>1908</u>	<u>6356</u>
Status of fleet as at 31 December 2020	1619.95	6277.83
Entries in 2020	85.37	144.42
Exits in 2020	21.36	101.57

D. Strength and weaknesses of the fleet management system with plan for improvements and information on general level of compliance with fleet policy instruments

D. 1. Summary of weaknesses & strengths of fleet management system

Considering that no major changes in the fishing fleet management were encountered in the last two years, it would be observed, as a benefit for the improvement of fishing fleet capacity the number of small-scale vessels is bigger than upper class segments see Annex 1.

The national administration strategy for the sector consolidation is to decrease the number of vessels in the segments fleet over 18m length, and to develop the segment 6-12m and 12-18 m in length, because these are more suitable for marine resources stocks exploitation in Romania Black Sea waters. The reduced number of fish species with significant economic value in the area, less than in Mediterranean area, is the key answer for the administrative strategy accepted even by the fishermen, so that the balanced indicators for this segment is presented on the relevant chapter of the report.

As a general comment should be emphasize that the fleet is in a precarious technical state, therefore the strategy should be applied constantly, aiming to improve both safety on board and working conditions. Having the same desiderate improve working conditions for fishermen Romania is planning to develop port fisheries port facilities as the current <u>landing points</u> used, such as: Mangalia, Olimp, Costinesti, Constanta, Mamaia, Cap Midia, Sf. Gheorghe, Sulina, are missing modern landing facilities this having a direct impact on the quality of processes which are under direct supervision of NAFA.

As a direct consequence of this the role of artisanal fishery is rising, Romanian activity being more and more oriented to traditional fishing activities, in shore proximity and naturally focused on small species catches. Actually, the fishermen are frequently switching from a gear to other during the same season, on irregular basis, a practice that is not according to scientifical recommendations. The infrastructure of specialized port facilities, specifically the berths and the storing facilities offering satisfactory technical conditions to organize first sale activities is still missing, practically, the situation is like the one presented on previous report. It should be still highlighted the fact that the access to financial resources for investments is still difficult, this being one of the reasons there is limited progress on transforming the current status quo.

The strength to weaknesses analysis for Romanian fishing activity follows some unique strengths coming from the specifics of the geographical area and the local tradition but also some weaknesses that need to be address in the coming period:

Strengths:

- •Some new availabilities of business environment to invest in fishery.
- •Fishing resources, relatively diversified, i.e.: pelagic species (sprat, anchovy, horse mackerel, pontic shad, grey mullet), demersal species (turbot, mullets, gobies, sharks, whiting) and mollusks (Rapa whelk, mussels, some quantities of vongole).
 - •Gears already regulated from the selectivity and exploitation pattern.
- •Local and long tradition for small-scale fishery (coastal fishery) as well as primary processing knowledge.
 - •Increased interest of business environment to invest in fishery.
- •Tradition in fish consumption, especially during the touristic season, is perceived more and more as an opportunity.
 - •The active fishery organizations at Romanian littoral.
- •Actions and new strategies developed with EU, EFCA and GCFM (especially for small-scale fishery).

- •Existence of living aquatic resources with economic value.
- Existence of fisheries infrastructure and research staff.
- •Profitability of the fishing fleet good level of education of fishermen.
- Existence of a good collaboration at institutional level, with other institutions and organizations involved in the experience gained in the period 2012-2019 regarding international collaborations and initiatives, especially in the implementation of the Common Control Program Romania-Bulgaria, control, inspection and implementation activities in application.
- •Experience gained during 2014-2019 in implementing the data collection program and Action Plans for data collection and control.
- Good collaboration with the profile research institutes and with ARBDD, participants in the realization of the data collection program.

Weaknesses:

- •The seasonal nature of fishing activity puts pressure on fish agglomerations.
- •Quantities of fishes at long distance from shore, unfavorable to fishing effort.
- •The migratory character of almost all species in the marine area, makes Romanian maritime fishing highly dependent on the state of stocks at regional level, and implicitly on the resource management of neighboring states.
- Not enough number of vessels for the Black Sea pelagic species due to the EU's threshold for engine power budget and to displacement ceilings.
- •Vessels morally and technically used without the capacity to keep catches and preserve their quality until the point of landing.
 - Specific infrastructure poorly developed (ports, landing points, first-sale points, shelters);
- •The absence of facilities at landing points for primary processing, logging and temporary storage of untaken catches immediately after landing.
 - •Low marketing activity specific to the fishery products.
 - •Still existent IUU fishery and including some non-taxed market of marine accessed resources.
 - •The low economic value of most fish species in the Black Sea.
- •Lack of financial capital of operators and low access to bank credits due to low financial standing.
 - •Lack of available qualified fishermen.
 - Poorly developed specific infrastructure (ports, landing points, points of first sale).
 - •Low profitability caused by high production / operating costs and environmental restrictions.
 - •Non-performing techniques and equipment (engines, methods and fishing gear).
 - •The seasonal nature of fishing -Limited financial capacity of operators.
- •Unsustainable practices or behaviors that lead to undesirable impact of commercial or recreational fishing activities on aquatic ecosystems.
 - •Modification or transformation of breeding or feeding habitats of fish species.
 - •Reduced capacity of human capital involved in small-scale fishing.
- •Reluctance on the part of fishermen and fishing enterprises to provide data, especially economic data.

Possible Solutions foreseen to improve:

- •Development of internal consumption market with high absorption potential.
- •Non reimbursable financial support from the Operational Plan for Fisheries and Maritime Affairs.
- •Stress on potential for fishing tourism and other complementary activities.
- •Creating the possibility of primary processing on board vessels.

- •Availability of equipment and vessels and craft equipment necessary to maintain catch quality till the landing points.
 - •Development of on the field, medium and complex educational programs.
 - •Development of research and widespread implementation of research results.
- •Improve the management of Black Sea fishery resources by expanding cross border collaboration (conventions, joint expeditions, standardized methodologies for inventory evaluation and research) and implementing integrated maritime policy guidelines to be applied by all riparian countries of Black Sea.
- Organization, design, implementation, and operation of an information system on licensing, authorization, and reporting of fishing activities, as well as trade in fishery products. Institutional organization and regulation of the national fisheries sector and market.
- •Consolidation of the multidisciplinary collaboration framework between fishermen, processors, research institutes / academia and public authorities with responsibilities in the field.
 - •Internal market with high potential for absorption of indigenous fish.
- •Establishment of regional instruments for the development / implementation of fisheries policies and resource management, multiannual plans, TACs, common expeditions, high-level conferences.
 - Research / academic environment and public authorities with responsibilities in the field.
- •Development of tourism related to fishing activities and diversification of activities complementary to fishing.
- •Existence of ports and landing places used for the operation of commercial fishing vessels, which can be upgraded.
- •Processing fishery products adds value to products and provides a source of income for traditional fishing communities.
 - •Common management of fish stocks in the Black Sea basin.

Risks:

- •Introduction of fisheries equipment with a major impact on the ecosystem, insufficiently studied.
- •Excessive administrative procedures for accessing non-reimbursable financial support.
- Delays in reimbursement of expenses incurred by beneficiaries of Community financial support.
- •Lack of infrastructure to add value to products.
- •Lack of continuity in promoting fisheries policies.
- Insufficient input of professional fishermen organizations to promote the specific interests of members.

The risk analyses presented in the Annual inspection revealed some actions which are worth to be mentioned as they could influence the indicators for the fleet, such as:

- oRecords on official papers: erors/incompliton/lack of data in recording the landings;
- ONonconformities on spatio/temporal restrictions;
- oUse of nonconfirming fishing gears.
- •Insufficient organization of the distribution chain and capitalization of catches.
- •Inefficient management of the common fish stocks in the Black Sea basin.
- •Illegal, unreported and unregulated (IUU) fishing and its influence on the sustainable exploitation of fish stocks.
- Limited access to bank loans -Existence of abandoned / lost fishing gear in areas intended for commercial fishing.
 - •Legal status of lands / constructions for the development of fishing infrastructure.
 - •Climate change -Existence of the black market of fishery products.

D. 2. Plan for improvements in fleet management system

We must reiterate the same issues, as in the previous report: Romania is maintaining the target to have a minimum level ("minimum vitalis") of its fishing fleet operating in the Black Sea preserving and consolidating fishing activity, achieved target, and to develop related activities, target not yet achieved. Romania is maintaining the targets respecting/fulfilling the total ceiling levels, also aiming the consolidation of small-scale fishing fleet.

The Electronic Recording System (ERS), under Regulation EC 1224/2009 is to replace paper logbook and landing declarations and ensuring the accurate and faster record and transmission and exchange of data. In addition, the sales notes of all registered first-sale buyers are planned to be electronically recorded, conducting to a more accurate, fast recorded and transmissions of trading data (first sales points).

There were significant progresses on this process currently Romania implemented an integrated solution that consolidated and implemented the communication mechanisms to synchronize fleet information with EU Commission database. This process assumed importing and verification of existing database in order to align electronic representation of fleet information with paper and excel based information. This process is going to be finalized during the coming period.

Having the fleet database that includes licenses, authorizations and quotes management Romania sets the scene for moving towards automatic management of fishing activity. The process is a tough one not because of having IT&C tools in place but because of end-users (fishermen) adoption, as the target of the system is people with extremely low IT education.

Currently Romania has an ERS solution that proved to be quite complicated from fishermen perspective this having direct effect on the quality of data reported. Accordingly, Romania is on the process of building a new fisherman application focused on a simplified process of reporting. The process is on "proof of concept" phase and showed good results.

Implementation of the new solution require swapping existing technology with a new one, aligned with the current evolution on the market. The goal of the new technology is to add dual capabilities on communication devices (GSM and satellite) given the specific of Romanian fleet which is acting not far from the Black See shores.

Although the implementation of the new IT&C solution considered functionalities on all domains (fleet, fishing activity management, ISC) not all implemented functionalities are used due to misalignment between infrastructure technological upgrade on one side and the end user adoption of the system on the other hand.

Actually, the system is working simultaneous with the previous one, using paper documents. Only the flux system is to be finalized, and the actual operating system will be used till the finalization of ERS system operability, and DG MARE exchanges/transmissions, under specialized services of the EC and EFCA works, in implementation integrate system in course after the finalization of the installing activities after the contract assignment in January, 2020.

Romania implemented flux system interconnection and closed the VMS domain, currently Romania exchanging VMS data both with EU commission and EFCA but also with a member state (Bulgaria).

Additionally, Romania has started to implement fleet domain communication scenario having already in production environment SNAP-F and SNAP-L scenario with or without history and planning for completing the other ones.

Romania is implementing the EC control and inspection plan under EFCA guidance as mentioned above.

Currently Romania has implemented in an electronic format the control reports and is under the process of adding mobility on inspection and control domain by acquisition of mobile devices for every inspector together with required application that will insert the date into the central system in an automatic way. This step is a mandatory one for moving towards implementation of ISC scenario for communicating associated information via FLUX infrastructure.

D.3. Information on general level of compliance with fleet policy instruments

Romania is implementing annually technical measures aiming to achieve balance between national fishing capacity and the available fishing opportunities specific for the Black Sea. For this reason, Romania is using the principals of the EU CFP regulations, other specific regulations such as: managing the fishing fleet register, as well as the provisions of regional fishery management organization - GFCM recommendations. The level of compliance with these provisions generally is assured by:

- •Ceiling the fish catches up to the level of approved fishing opportunities allocated to fishermen on a system for TACs and quota allocations, based annually on scientific studies, by Orders of Ministry of Agriculture and Rural Development;
- •Managing, monitoring and controlling regularly the fish capacity at the level approved by EU Regulation 1380/2013 and Regulation 1224/2009;

Several important progresses were done during the last reporting period on Romanian compliancy with EU Regulation 1224/2009. Few of them could be highlighted here:

•On vessel monitoring domain:

oImplementation of new VMS system with new functionality allowing a better monitoring of vessels

oIntegration of VMS system on FLUX infrastructure and exchanging information with:

- ■EU Commission (DG MARE)
- EFCA
- ■Neighboring member state Bulgaria
- •On fleet domain:
- OImplementation of a new fleet register application
- oConsolidation of fleet register related information from various sources and cleaning the data to reflect the historical and current situation
- oIntegration of fleet register on FLUX infrastructure and implementation of normal query scenario. To be noted that snapshot procedures SNAP-F and SNAP-L are implemented but not in production.
- •On fishing activity domain:
- oMaintenance of existing solution that become obsolete in terms of new requirements and defined the requirements for a new acquisition of modernization services for ERS
- •On inspections and controls:
- oRequirements definition for a new acquisition to digitalize inspector's activity by equipping them with modern technologies (tablets) to be able to report their activity directly in the new database

E. Information on changes of the administrative procedures relevant to management of the fleet

During the last two years, despite of non-major/significant changes in the fleet structure, the administrative procedures are targeting for an improved management of fishing capacity, which have a low capacity/dimension level. We are reiterating the most relevant measures of fleet management in place:

- •System of annually allocation of fishing opportunities, based on scientific studies, by vessels fishing capacity, targeting species under EU TACs and national allocations in a system of authorizing vessels based on allocation schemes including specific criteria allocation of fishing opportunities;
- •Organizing meetings between fishermen, scientists and national authority implementing the CFP and national legislation;
- •Establishment the annual seasonal closure of fishery for the most relevant species in the area;
- •Establishing the fishing effort and list of fishing gear by annual order of the responsible authority;
- •The pilot study on the impact of Rapa whelk fishery using bottom trawls in relation with other demersal species namely turbot was launched. The preliminary results were submitted to DG

MARE in September 2017, and it will be continued on National Data Collection Working Plan implementation;

•Have been started actions, in cooperation with fishermen organizations and Advisory Council for Black Sea comprising the scientists aiming the improvement of better knowledge of the specific fishing gears used, assessing the impact on marine ecosystem, establishing common measures ensuring the sustainable exploitation of fishery resources and the protection of marine ecosystems through adapted technical measures, in order to put in place specific regulatory legislative acts at national level.

F. Estimation and discussion of balance indicators

A general comment should be done in the actual Report in order to withdraw the attention to relevant analyzing and decisional bodies of the EU to evaluate the impact of a small fishing fleet versus to a bigger fishing fleet and the unbalance on the fishing capacities of other national fleets on the area of Black Sea, and to address relevant technical, management measures in order to be achieved by all riparian countries of a level playing field on the exploitation of marine into the basin resources, leading to a similar managing system should be implemented, both in EU and GFCM commissions.

F.1 Technical indicator (Actual Effort*kW or GT) / (Maximum Effort*kW or GT)

As in the last 2019 Report in the calculation of the indicator have been used the "Guidelines for the analysis of the balance between fishing capacity and fishing opportunities according to Art 22 of Regulation (EU) No 1380/2013 of the European Parliament and the Council on the Common Fisheries Policy "(Brussels, 2.9.2014 COM (2014) 545 final).

In the Annex 2 are reflected the level of Ratio between fish days and maximum fish days per fleet segments for the analyzed period 2013-2019. In accordance with the relevant Guidelines for the indicator's calculation for active and passive gears have been used the capacity in kW for engine power and tons for GT.

We are reiterating that: in the waters of the Black Sea, especially for the N-W part, the fishing conditions are not favorable for a long fishing season. It is owed to the specific hydro-climatic conditions such as: many days with strong wind during autumn, winter and in the first half of spring season. Also, in the same periods of time are recorded very low temperatures leading to a seasonal fishery - the majority of fish pelagic species, are migrating in the Romanian littoral starting late in March and stopping this migration starting with month of September. In the same situation, it was observed that Rapa whelk starts to be present in the Romanian fishing area by month of May until no late than middle of November when the water temperature is already very low, around max 7-8° C. All these conditions are causing massive withdrawals of the species towards wintering areas that are not accessible, especially for small scale vessels that characterize the Romanian fleet, as number. Also, in order to reduce the impact on main species for economic interest, annually temporary closed fishing period during April - May -June is applied.

From these reasons, according to the records, data shows as result a number of fishing days theoretical/maximum amounting a level of <u>138 days</u>. This level is based on the average of fishing days observed by fleet segments. Annex 2, shows the level of calculated indicators, as mentioned above.

Annex 2 summarizes the technical indicator information for the 2013-2019 periods, calculated as the ratio of the current effort to the observed maximum effort. The observed maximum effort is calculated on the basis of the maximum days spent by a vessel in the relevant segment. This calculation option is preferred over the use of the theoretical number of days at sea, due to the fact, that no fixed areas exist in the Black Sea, where a total number of days at sea is fixed that a particular vessel may be present in, using a defined gear or targeting a stock. For this reason, we believe that, in the absence of such restrictions, fishing vessels with similar characteristics may spend the same number of days at sea. Another reason for choosing the maximum number of days at sea is the possibility of comparability of data from previous years.

Table 8. The Vessel Utilization Indicator (VUR) 2013-2019

Fleet segment	2013	2014	2015	2016	2017	2018	2019	Average period 2013- 2018	Trend 2019 to average period 2013-2018
VL0006 PMP	0.11	0.11	0.18	0	0	0	0	0.07	0
VL0006 PG	0.29	0	0	0.2	0.11	0.27	0.30	0.15	increased
VL0612 PMP	0.16	0.15	0.31	0.31	0.34	0.33	0.28	0.27	increased
VL0612 PG	0.13	0.13	0.15	0.16	0.14	0.17	0.21	0.15	increased
VL1218 PMP	0.23	0.26	0.39	0.49	0.36	0.45	0.50	0.36	increased
VL1824 PMP	0	0	0.22	0.52	0.68	0.58	0.54	0.33	increased
VL2440 PMP	0.67	0.59	0.82	0.67	0.69	0.52	0.56	0.66	decreased

As indicated in Annex 2, the technical indicator was calculated mainly on the basis of the maximum days observed -138 days.

For 2019, the VUR trend shows an increase compared to 2018, for the segments VL0006PG, VL0612PG, VL1218PMP and VL 2440PMP and a decrease for the segments VL0612PMP and 1824PMP where they have lower values.

These vessels had a small number of days because these use turbot nets (prohibition period, do not often go to check the nets due to high fuel consumption).

Fishermen in these segments of the small coastal fleet work full time, but have additional sources of income.

The trend is analysed for 2019 and is related to the average of the period 2013-2018, where there is an increase in all fleet segments except for the VL2440PMP segment. See Table 8.

F.2. Biological indicators

F.2.: Ratio between F estimated and F target (F/Ft)

To facilitate comparisons and to avoid duplication of work, we used data collected according to the Data Collection Framework for National Fisheries Data Collection Program, send to various STECF meetings dedicated for stocks status assessment, Black Sea analyses, etc., or GFCM working groups meetings for the Black Sea (WGBS) - in all of these meetings Romania is only country in the region submitting all required data.

Fishing mortality (F) and FMSY used for analysis is specified at Black Sea level because the fish species having commercial value are shared within EEZ of the Black Sea riparian countries (namely sprat, turbot, anchovy, whiting, dogfish, red mullet, etc.). The EU representatives on the working groups could confirm it.

Two indicators are used to assess whether vessels are relying on overfished stocks (SHI), or involved in causing a high biological risk to a depleted stock (SAR). We are mentioning that the segment VL1824m is missing, in past years, due to the fact it was catching only Rapa whelk, which is not in the species list of the National Program Data Collection for 2017-2019.

The indicators are calculated for all area of the Black Sea according to GFCM/FAO division's definition — namely for the area FAO 37.4.2 and GSA 29 — only one area and no subdivisions. Romania proposed, and various working groups of GFCM, EU Commission (e.g., RCMMed&BS 2012, WGBS 2017) approved the significative recommendations to address all

issues for a single stock exploited by several/deferent fleets, of the riparian countries, corresponding of each member state jurisdiction.

At the high-level Conference of the GFCM, October 2016, Bucharest, all parties agreed to apply the same management measures of the fisheries, but despite their commitments on the occasion of the conference, on the fishery development for a sustainable exploitation of the fishing resources, until now the actual results of these started works the signification of the biological indicators is not used in the works of all riparian countries.

For the same reasons we are underlining the fact that not only for practical reasons these indicators are not suitable for the assessment of the unbalanced or balanced ratio between fishing opportunities and fishing capacities for EU countries in the area, Romania and Bulgaria. So that, the conclusions on the fact that the fishing fleets of mentioned countries are influencing the general situation of the stocks in the area is not fair, due to the mentioned above rationales. In those conditions these indicators are presented in the report only in order to fulfil the RO commitments to the EU. Romania considers these indicators to be adapted to the specific conditions of RO and BG fleets in the area, or to be avoided in the future if no alternative will be available for the next year.

It should be emphasized that this catches contribution of the Romanian fishing fleet cannot be expected to have a noticeable impact on the status of the fish stocks exploited by the Romanian fishing fleet, since Romania exploits a very small fraction of these stocks in comparison to other Member States or other riparian countries in the same sub region and/or whole region of the Black Sea whose fishing vessels are targeting the same stocks. With regard to this, it is important to note that Romanian catches have always been low and they are in the last few years less than 0, 10% of their exploitation in the GFCM area, while the overwhelming share of the stocks is caught by other third riparian countries with whom Romania shares these stocks species in GSA 29.

That's why we are reiterating the same assumptions as in the last 2019 Report:

1) SHI - indicator

In table 9 are presented the results of the values estimated for the Sustainable harvest indicator (SHI) for Romanian fleet in 2019. For 5 of the fleet segments, the value of the indicator is below 1, indicating that are in balance and only for one segment PG 6-12 m the value is above 1. Taking in consideration that fish species like sprat and turbot are under quota, the share harvested from the Black Sea area by Romania of other species is very low, under 0.5%. This trend in total fish catches was recorded every year and the SHI value also registers a decreasing tendency.

The sustainable harvest indicator (SHI) is a measure of how much a fleet segment relies on stocks that are overfished. Here, "overfished" is assessed with reference to Fmsy values over time. Threshold: Values of the indicator under 1. When the value of SHI is > 1, indicates that a fleet segment is, on average, relying for its income on fishing opportunities which are structurally set above levels corresponding to exploitation at levels corresponding to MSY. In the Romanian fleet segments, values of SHI are in Table 9: under 1 (<1) for the segments PMP < 6m, PMP 6-12m, PMP 12-18m, PMP 18-24m and PMP 24-40m, that are estimated to be in balance. Only one segment PG 6-12m is over 1 (>1) – not in balance.

The fishing opportunities do not necessarily match the MSY objective at all times, but the first biological indicator has been designed with this overall objective in mind.

In the Romanian case, it would however not be appropriate to conclude that a fleet segment is necessarily in imbalance if we take into account that the transition is underway to align fishing

opportunities with the MSY objective as set out in the CFP and also if we take into account the values of the stocks-at-risk indicator (SAR).

2) SAR - indicator

In the last year Report Romania mentioned, and we are reiterating it, the comment from Guidelines: "The stocks-at-risk indicator is a measure of how many stocks are being affected by the activities of the fleet segment in other words, stocks which are at low levels and are at risk of not being able to replenish themselves and which are either important in the catches of the fleet segment or where the fleet segment is important in the overall effects of fishing on the stock.

Threshold: if a fleet segment takes more than 10% of its catches taken from a stock which is at risk, this could be treated as an indication of imbalance. If a fleet segment has an impact on one or more stocks at high biological risk, this is an indicator of a potential capacity imbalance.

It is not the case of the Romanian catches, Compared to catches made at the Black Sea level, Romanian catches are below 10% most of them under 1% so that SAR indicators are not calculated by Romania."

Table 9. Biological indicators

Fleet segments	Biological indicators	2014	2015	2016	2017	2018	2019
PMP	SHI	3.54817	7.258358	0.71504	0.70321	0.68532	0.67859
	SAR	0	0	0	0	0	0
PMP 6-12m	SHI	4.828312	3.241051	0.97554	0.95686	0.93274	0.92976
	SAR	0	0	0	0	0	0
PMP 12-18m	SHI	4.784007	4.833876	0.81026	0.81025	0.80526	0.80330
	SAR	0	0	0	0	0	0
PMP18-24m	SHI ,	0	0	0.64087	0.64121	0.62322	0.62157
	SAR	0	0	0	0	0	0
PMP 24-40m	SHI	2.766669	2.388445	1.01521	0.99845	0.97653	0.97559
	SAR	0	0	0	0	0	0
PG 6-12m	SHI	4.110951	2.526987	1.82199	1.80256	1.75217	1.73103
	SAR	0	0	0	0	0	0

F.3. Economic indicators

The economic indicators are calculated using the last version of the Commission Guidelines (2.9.2014), data provided by the National Program for Data Collection. The indicators are provided for each segment of the fleet, based on the total number of 138 active vessels registered in Romanian Fishing Fleet Register – see Annex 1.

1) ROI = Net profit / Capital asset value

Net profit = (Income from landings + other income) - (crew costs + unpaid labour + energy costs + repair costs + other variable costs + non-variable costs + depreciation)

Capital asset value = Vessel replacement value + estimated value of fishing rights

2) BER = (Fixed costs) / (1- [Variable costs/Current revenue])

Fixed costs = Non variable costs + depreciation

Variable costs = Crew costs + Unpaid labour + Energy costs + Repair costs + Other variable costs

Table 10. Economic data and calculation of Economic indicators in 2019 Euro

Indicators	VL2440PMP	VL1824PMP	VL1218PMP	VL0612PG	VL0612PMP	VL0006PG
Income	5 5483 5	102422	1906468	34 8 829	1321954	118838
Other income	0	0	0	0	0	0
Current revenue	554 835	102422	1906468	348829	1321954	118838
Crew costs	87236	11817	337933	161913	213735	47042
Unpaid labour	1669	0	1669	25000	2700	3000
Energy costs	105033	14765	356478	29038	186358	10841
Repair and maintenance costs	41705	355	72362	27433	77283	8940
Other variable costs	2521	73	18824	10954	48435	5127
Non-variable costs	36680	725	73100	22302	64690	8965
Depreciation	43427	7568	156945	11556	31449	1422
Total costs	318271	35303	1017311	288196	624650	85337
Net profit	236564	67119	889157	60633	697304	33501
Vessel replacement value	3130000	360,000	4620000	527110	719646	82720
Estimated value of fishing rights	14338	683	27014	8932	13548	2291
Capital asset value	3144338	360683	4647014	536042	733194	85011

ROI	7.52%	18.61%	19.13%	11.31%	95.1%	39.4%
ROI – risk free	2.98%	14.07%	14.59%	6.77%	90.56%	34.86%
long-term interest rate						
BER	140539	11207	389907	125400	160232	28073
CR/BER	3.95	9.14	4.89	2.78	8.25	4.23

ECB - interest rate 4.54 Source data regarding long term interest rate -

http://sdw.ecb.europa.eu/quickview.do?SERIES_KEY=229.IRS.M.RO.L.L40.CI.0000.RON.N.Z

The indicators calculated and analysed in the Report chapter conduct to the conclusion in 2019 Romania's fishing fleet was in balance with the fishing opportunities in the Black Sea national fishing area, for 3 segments and only 3 segments unbalanced.

Comments:

Interest rate for long term was: in year 2015 = 3.47, 2016 = 3.32, 2017 = 3.96, 2018 = 4.69 and 2019 = 4.54, the average of the 5 years is 4.00 corresponding to a decrease of 3.20 % from last year 2018, an insignificant value, and an increase over the year 2017 - 15 %, so the access to financial support is quite difficult making impossible for fishermen to loans to improve the technical condition on board vessel and replacing fishing gear. In the same rational the efficiency of activity appears to be small due

to the high level of interest rate consider for calculations.

1) Return of investment (ROI).

The interpretation of the values of ROI is based comparing the medium value of the Long-term interest rate of 4.69 % in 2018 and 4.54 % in 2019 the ECB/National Bank of Romania, contributing to a less in balance segments, as above mentioned -see Table 10.

In 2018, the highest values of the indicator were in VL0612PMP-69.1 % and VL0006PG-40.21 % segments. Values of ROI for 2019 show that the most profitable was the VL0612PMP -95.1 % segment, followed by segment VL0006PG - 39.4 % and VL1218PMP-19.13 %.

In 2019, the fleet segments illustrate a good level of ROI/profitability, excepting the segments VL2440PMP -7.52 % and VL0612PG -11.31 % segments. See Annex 3.

The main focus of fishing activities was on Rapa whelk; the increasing harvest led to a very big value of total landings and the corresponding value as revenue. Meantime, in the case of Rapa whelk harvesting, offers good conditions for exploitation, vessels are not spending to search agglomeration locations, Rapa whelk being a species grouped in the same areas of mussels, for feeding. There still persist the situation for vessels in terms of a fuel consumption, but their technical conditions proving the contrary, that meant a significant fuel consumption is registered, on the segments. This trend of fishermen to focus in Rapa whelk fishery, lead to an increased dependency of fleet on the Rapa stocks abundance. Despite of a decreasing tendency of unit price for the Rapa species (first sale price) the availability on the stocks and increased landings achieved are leading to a good profitability of the fleet segments.

2) The ratio between current and break-even revenue (CR / BER).

The profitability level is shown, also, by the level of the ratio of CR/BER indicator - Table 10, with a level above about/over 3 points, suggesting the sufficient revenue generated by the fleet covering the variable and fixed capital, costs, so the segments are profitable. In 2019 the fleet segments **illustrate a good level of CR/BER**, excepting the segments VL2440PMP -3.95 % and VL0612PG -2.78 % segments.

The 2018 results show that all of the segments are profitable and able to cover their costs.

The value of the CR/BER indicator for these segments is higher than 1. The highest indicator value is observed for segment VL1824PMP-9.73, followed by the segment VL0006PG - 8.92 and VL0612 - 7.16. In long-term, the indicator has a positive value of all of the segments. In the short term, in 2019 the value of the indicator in all of the segments has an indicator value greater than 1. In these segments, sufficient income is generated to cover variable, fixed and capital costs and are considered profitable. The highest indicator value is observed for segment VL1824PMP-9.14, followed by the segment VL0612PMP - 8.25 and VL1218PMP - 4.89. See Annex 4.

