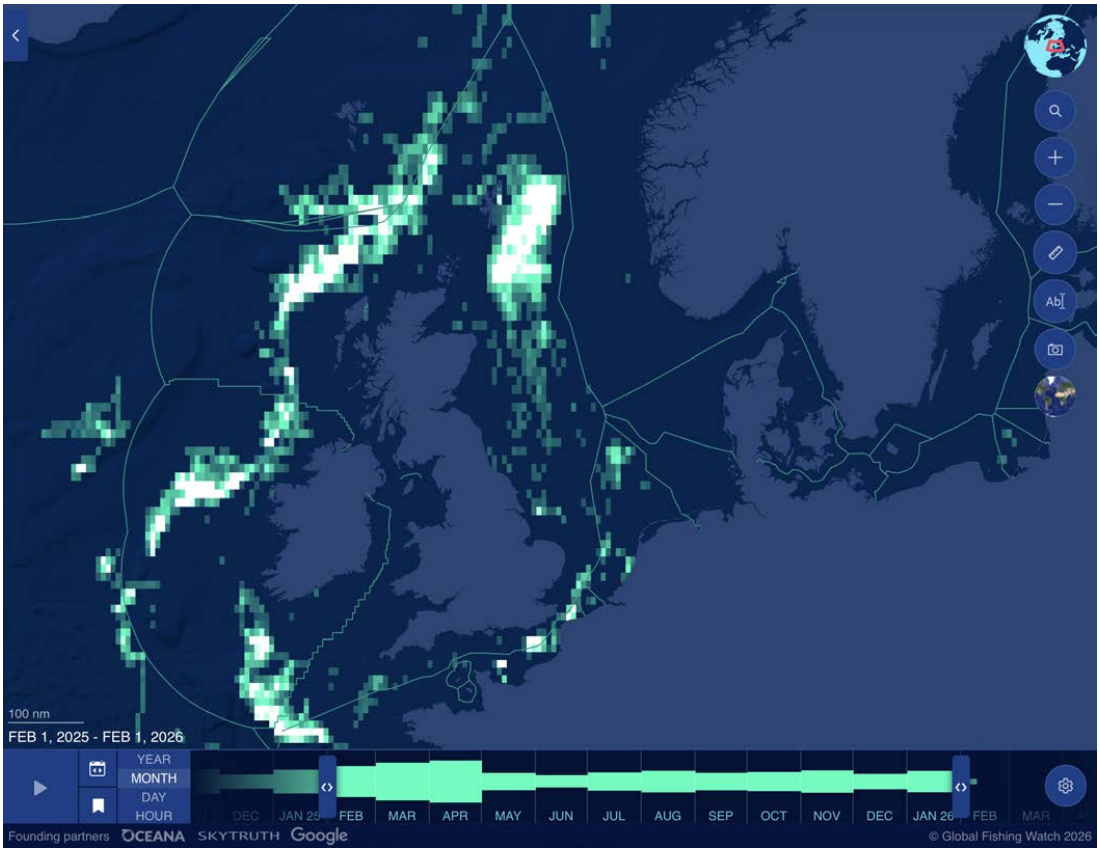
# Why the EU should follow Scotland and require CCTV on 'supertrawlers'

## POLICY BRIEF

On 7 March 2026, Scotland became Europe's first jurisdiction to require remote electronic monitoring (REM) systems, including cameras, onboard pelagic trawlers, enhancing its capacity to gather data on their activities at sea, including discarding.[1] To ensure a level playing field across shared EU-UK fisheries and curtail large-scale unreported dumping of catches, the EU should follow suit and cooperate. This should begin by explicitly requiring REM on its pelagic freezer trawlers, which fish extensively in Scottish, other British and EU waters. This brief lays out the **issues** around the largest of these, so-called 'supertrawlers', and the different **REM requirements and priorities** in Scotland and the EU, and concludes with **recommendations**.

# Summary

- The unreported dumping of fish to make room for higher-value catch is illegal under both EU and UK law.[2] Pelagic freezer trawlers targeting pelagic species like herring and depleted mackerel populations in the Northeast Atlantic[3], have been recognised as at high risk of engaging in this practice[4].
- New EJF research shows that 10 pelagic freezer trawlers, all over 100 metres in length and linked to Dutch ownership[5], **spent an estimated 14,530 hours - 1.5 years collectively - fishing in Scottish waters in the year to 1 February 2026,** and an additional 1,168 hours in other UK waters (**see appendix below**). These vessels also appeared to operate extensively across Irish, French and international waters (see **map**).
- Since 7 March 2026, Scotland requires Remote Electronic Monitoring (REM), including CCTV, on all relevant pelagic vessels fishing in Scottish waters. This allows authorities to monitor compliance, including discard bans, more effectively. However, the new requirement does not cover relevant non-Scottish pelagic vessels outside the Scottish zone, meaning effectiveness will also depend on other jurisdictions rolling out interoperable REM systems.
- The UK's largest trawler installed remote electronic monitoring in 2024, yet the EU has yet to explicitly require REM for the Dutch, German, Polish and Lithuanian supertrawlers operating in Scottish and UK waters.
- To ensure accurate quota uptake and a level playing field for EU-UK fisheries, the EU, including the relevant EU Member States, should specify - at a minimum - pelagic freezer trawlers as high-risk vessels, and require installation of REM on board as soon as possible. They should also ensure interoperability of REM standards across EU and UK jurisdictions and strengthen cross-border cooperation in enforcing discard bans.



Map of fishing pressure visualised on Global Fishing Watch

# 1. The Issue

## Industrial-scale fishing pressure

Pelagic freezer trawlers target schools of herring, mackerel and blue whiting using echo-sounding equipment. As their nets are too large to be brought onboard, pumps are used to haul catches onboard into cooling tanks. Catches can be processed at sea, allowing extended high-volume fishing trips.[6] While limited in number, pelagic freezer trawlers' catches are large. For example, Dutch pelagic and German freezer trawler fleets landed well over 200,000 and 100,000 tonnes respectively in 2017-2018.[7] These vessels operate in EU and UK waters, reflecting the migratory nature of the pelagic fish populations they target, as well as the shared management regime after Brexit.[8] Several pelagic freezer trawlers have repeatedly drawn public attention and are known to be fishing in Scottish waters[9] in recent years, including in UK MPAs.[10]

Analysis by the Environmental Justice Foundation (EJF) of Global Fishing Watch (GFW) data on fishing effort of vessels of 100 metres and above in the year leading up 1 February 2026 shows that nine EU-flagged pelagic trawlers (four flagged to the Netherlands, two to Poland, two to Germany, one to Lithuania) as well as one UK-flagged vessel collectively fished an estimated 14,530 hours in Scottish waters, with an additional 1,168 hours in UK waters (see **appendix below**). Mapping of fishing pressure shows intense activity beyond Scottish waters, namely in Irish, French and Dutch waters (see **map above**).

## Discarding risk

Scientific assessments suggest a longstanding risk of discarding among pelagic freezer trawlers.[11] Discarding of unsorted catches is possible via pumping catch directly from the chilling tanks out to sea, or opening the codend of the net while the net is still in the water.[12] Pelagic freezer trawlers are also known to have equipment to automatically 'grade' catches, facilitating large discards.[13] Suspicions of highgrading have been repeatedly raised: this is a practice where operators intentionally retain the most valuable catch whilst discarding smaller, less valuable fish back into the sea[14], such as juvenile mackerel[15]. This can make a difference of "*several hundred thousand euro per trip*".[16]

However, determining whether a discard is accidental or intentional may be difficult without authorities deploying effective control tools:

- A pelagic freezer trawler, the **Polish-flagged ANNELIES ILENA,** was detained in 2013 in Irish waters, leading to convictions on several charges, including illegal discarding. However, a charge for highgrading was withdrawn in court.[17]

- A large-scale spill of blue whiting in the Bay of Biscay on 3 February 2022 was traced to the **Lithuanian-flagged supertrawler MARGIRIS**, triggering investigations by French authorities and the European Commission. The owner attributed it to an unintended rupture in the net[18], a claim others disputed.[19] The vessel, the MARGIRIS, had CCTV on board when it was inspected at the landing port later that month, and footage could have helped determine whether the discharge was indeed accidental. However, no such footage was put forward by the ship's master for review by Lithuanian authorities, which gave cause to "*question the legitimacy of the statements provided*" by the master and owner.[20]

# 2. REM requirements & priorities

Remote electronic monitoring (REM) systems, including CCTV, while "*not a panacea*" to end illegality in fisheries, are a cost-effective control measure for authorities around the world, including to check compliance with discard bans.[21] For example, in Denmark, REM systems, including cameras, boosted bycatch reporting for cod; after the introduction of cameras, reports surged 878% in a period where cod populations were sharply declining.[22] Many jurisdictions have committed to rolling out REM in the coming years, including Scotland and the UK, which have indicated priority fleet segments for REM installation.[23]

On 12 February 2026, the Scottish government confirmed[24] that on 7 March 2026, its new requirement will apply to all "*relevant pelagic vessels*" (irrespective of their flag) of 12 metres or more in length, equipped with a chilled or refrigerated seawater system or freezer storage, and deploying nets targeting small pelagic species in the Scottish zone[25]. Freezer trawlers appear specifically covered in technical specifications detailing where to install digital cameras (namely where "*freezing or other processing of fish is carried out on board*").[26]

Outside this zone, these requirements only apply to relevant Scottish-registered vessels.[27]

In late 2023, EU Member States committed to ensuring that EU vessels of 18 metres that pose a *"high risk"* of non-compliance with the landing obligation have REM systems, including CCTV, installed on board by 10 January 2028.[28] However, which fleet segments constitute *"high risk"* still has to be determined in secondary legislation (implementing acts), leaving uncertainty about whether pelagic freezer trawlers will be prioritised.

## Risks of regulatory divergence

The new Scottish REM requirements appear applicable to the entire Scottish pelagic fleet (22 vessels) and the 155 non-Scottish vessels which currently fish in the Scottish zone.[29] Even if applied to all freezer trawlers, without the EU flag states concerned deploying adequate control measures on these vessels, and in the absence of clear EU legal authority, it would be unlikely to deter all illegal discarding or highgrading on board. As the **map above** shows, these vessels operate continuously across EU and UK waters, including Scottish, Irish and French waters and highgrading decisions can occur anywhere during a fishing trip. This is illustrated by the case of suspected highgrading involving the ANNELIES ILENA, which reportedly took place just 20 miles south of Scottish waters.[30]

The presence of REM systems, which vessels fishing in Scottish waters will continue to carry onboard throughout their fishing trip, alone does not ensure effective oversight. The deterrent value of REM primarily depends on clear legal authority, the access of relevant competent authorities to footage, and their capacity to review it. It also depends on credible enforcement. However, once non-Scottish vessels leave the Scottish zone, primary enforcement responsibility shifts to other authorities and the flag state. Without aligned standards, effective data sharing between coastal, flag and port states, and consistent enforcement across jurisdictions, deterrence will weaken at maritime boundaries. This creates a risk that illegal discarding or highgrading will shift geographically, rather than limiting it, undermining both conservation objectives and the level playing field for compliant operators.

This risk is compounded by the fact that, on 6 June 2025, the European Commission indicated a *"lack of effective control measures adopted by Member States to date"* to enforce the EU's ban on the undocumented discarding of unwanted fish at sea. Its audits of two of the relevant flag states, the Netherlands and Lithuania, supported this further.[31] The audit on the latter noted that, as the exact details and circumstances of the MARGIRIS' discarding incident in the Bay of Biscay in 2022 were *"unknown to the Lithuanian authorities"*, this reflected that Lithuania *"does not ensure control and enforcement of the fishing activities of this vessel (or any vessels in the Lithuanian distant-water fleet)"*.[32]

The Commission stressed applying REM to this vessel and other larger pelagic vessels would be a *"particularly feasible"*, cost-effective and risk-based way to monitor compliance with the landing obligation. However, Lithuania's response to the European Commission's draft audit report of the incident suggested *"exploring the installation of REM on board the highest-risk fishing vessels and considering the use of CCTV cameras, only once EU legislation has been established."*[33] This points to policy risks that divergence on REM requirements and priorities would bring after the Scottish REM rules for relevant pelagic vessels kicked in on 7 March 2026 and before the EU establishes equivalent requirements:

- **Control shopping:** Discarding could shift geographically to less-monitored waters.
- **Unfair competition:** Scottish pelagic vessels will face comparatively stricter monitoring on quota uptake than industrial-scale foreign competitors when effective, interoperable and mandatory REM systems are not applied to non-Scottish pelagic freezer trawlers outside the Scottish zone.
- **Unmonitored discarding:** As migratory fish populations (e.g. mackerel) are jointly managed, one jurisdiction's inadequate monitoring of discarding, especially by vessels catching at industrial scale, undermines conservation in all.

## Opportunities for alignment on REM

Scotland has anticipated wider adoption of REM by other fisheries administrations, and expects that it will *"help demonstrate to consumers and retailers that Scottish fishing vessels operate in a legal and responsible way no matter where they fish"*.[34] The UK (DEFRA) has already prioritised REM installation on its largest freezer trawler, the **UK-flagged FRANK BONEFAAS** (it completed this over a period of 18 days in two periods over the summer of 2024).[35,36]

The EU has yet to follow suit, although the European Commission has regularly engaged with Scotland and the UK, and indicated REM system interoperability is a priority amidst stakeholder concerns.[37] It has

also stressed in the wake of the MARGIRIS incident that pelagic freezer trawlers are *"inherently very high risk"* of illegal, undocumented discarding, citing the extensive evidence of discard incidents and presence of equipment on board that facilitates discarding, and asked EU Member States to *"review the risk level of pelagic freezer trawlers further to this incident"*.[38]

If the relevant EU Member States agreed and established the risk level of non-compliance as high for this fleet segment in line with Article 13(3) of Regulation 2023/2842, it would likely improve catch data accuracy, which is a core principle of the EU-UK Trade and Cooperation Agreement (TCA).[39] Prioritising REM installation on pelagic freezer trawlers would also help level the playing field, reduce regulatory uncertainty, and serve as a practicable, cost-effective and risk-based approach to enhance compliance with the landing obligation.

The monetary value of compliance benefits was not estimated in Scotland's assessment of a business case for REM, in part due *"to the unknown element of the level of non-compliance with the landing obligation"*[40]. However, past testimony by individual fishers suggests commercial interests in enhancing compliance, in view of REM's perceived (eventual) positive impact on quota opportunities and profits.[41] Moreover, the emergence and roll-out of REM technology worldwide has been positively assessed by the fisheries certification body MSC[42], which has recently urged retailers and restaurants to stop selling mackerel from the Northeast Atlantic[43], a key target stock of pelagic freezer trawlers. In this regard, alignment on REM technology between the EU, Scotland and the UK is not just an opportunity to demonstrate a commitment to transparency and accountability in these fisheries, but also to enable fish population recovery and fishers' profitability.

# 3. Recommendations

Pelagic freezer trawlers catch very large volumes of shared pelagic fish populations, operate transnationally across EU and UK waters, and have known, proven discard risks. Without the EU following Scotland's lead on REM, the risks of unreported discarding and unreliable catch data outside the Scottish zone, including of depleted fish populations like mackerel, will remain elevated. Recognising this, **we call on the EU, in particular relevant EU flag states - the Netherlands, Germany, Poland and Lithuania - to**:

1. **Establish a REM requirement that at least covers pelagic freezer trawlers:**

    a. Specify pelagic freezer trawlers as vessels as high risk in the implementing act foreseen in Article 13(3) of Regulation (EU) 2023/2842; and

    b. Install REM systems on pelagic freezer trawlers as soon as practicable, and well before the 2028 deadline set in EU law.

2. **Cooperate with the UK and Scotland to ensure broader REM alignment and TCA compliance:**

    a. Ensure interoperability of REM standards for different fleet segments through regular technical dialogue, including regarding newly emerging REM regimes; and

    b. Strengthen cross-border cooperation on enforcing discard bans, with a view to ensuring the accuracy of catch data of shared fish populations, in line with the TCA.

# Appendix - 'supertrawlers' in UK and Scottish waters

**Apparent fishing hours by trawlers of 100 m > fishing in UK and Scottish waters for the period 1 February 2025 to 1 February 2026** (Global Fishing Watch data*).

| Vessel name | IMO nr. | flag | Length Overall | Gross Tonnage | Fishing hours in UK | Fishing hours in Scotland |
|---|---|---|---|---|---|---|
| **Annelies Ilena** | 9204556 | **Poland** | 142.5 | 14113.4 | 1201.5 | 1200.2 |
| **Maartje Theadora** | 9182801 | **Germany** | 140.8 | 9091.5 | 2698.3 | 2599.9 |
| **Willem Van Der Zwan** | 9187306 | **Netherlands** | 139.8 | 9468.9 | 2628.1 | 2577.7 |
| **Margiris** | 8301187 | **Lithuania** | 134.8 | 9099.4 | 56.2 | 56.2 |
| **Afrika** | 9175834 | **Netherlands** | 126.2 | 7108.7 | 1751.1 | 1477.4 |
| **Sch 81 Carolien** | 9162655 | **Netherlands** | 124.8 | 7031.4 | 1138.5 | 903.3 |
| **H72 Frank Bonefaas** | 9074951 | **UK** | 119.7 | 6537 | 2003 | 1887.5 |
| **Helen Mary** | 9126364 | **Germany** | 116.6 | 7278 | 1783.5 | 1660.5 |
| **Sch123 Zeeland** | 8901913 | **Netherlands** | 114.6 | 3151.3 | 1248.9 | 989.3 |
| **Alina** | 8918318 | **Poland** | 110.8 | 5099 | 1189.8 | 1178.7 |
| **Total fishing hours** | | | | | 15698,9 | **14530,7** |

* Global Fishing Watch analyzes AIS data collected from vessels that research has identified as known or possible commercial fishing vessels, and applies a fishing detection algorithm to determine "*apparent fishing activity*" based on changes in vessel speed and direction. The algorithm classifies each AIS broadcast data point for these vessels as either apparently fishing or not fishing and shows the fishing on the Global Fishing Watch apparent fishing effort heat map.[1]

** All vessels have been linked to Dutch ownership structures.[2]

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