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NOTE

From:	General Secretariat of the Council
To:	Delegations
No. prev. doc.:	11416/1/20 REV1 PECHE 284 CODEC 933 CADREFIN 302
Subject:	Proposal for a Regulation of the European Parliament and of the Council on the European Maritime and Fisheries Fund and repealing Regulation (EU) No 508/2014 of the European Parliament and of the Council (EMFF) - Latvian comments

Delegations will find attached written comments by the Latvian delegation on the above-mentioned proposal.

**Written comments by the delegation of LATVIA on the Draft Revised Mandate for the EMFF
2021-2027**

(doc. 11416/1/20 REV1)

Row/Article	Written comments by the delegation of LATVIA
Row 161 Article 12(2)	We support position of the European Parliament for a period of two years instead of five. The condition must be assessed in accordance with the principles of proportionality of administration.
Row 205 Article 16(2) Row 205d Article 16(3a) point c	We see no justification for setting different minimum age limits depending on the length of the vessel (3 years for vessels of less than 24 meters and 5 years for vessels of more than 24 meters). We propose for all lengths to apply one minimum threshold - 3 years.
Row 210j Article 16b(1)	We disagree with changing the term “fishing capacity” to “gross tonnage”. Fishing capacity is a broader concept that also includes engine power (kW) and it is important in relation to energy efficiency.
Row 210m Article 16b(1) point c	We encourage lowering the threshold for the relevant years, for example to at least 5 years. There is no clear justification how a condition of support for vessel safety, working conditions and energy efficiency for increasing gross tonnage only for vessels over 15 years of age contributes to the implementation of the Green Deal main principles.
Row 220 Article 17(3)	In the name of a compromise we can agree, but please note that the CPR provisions allow MS to choose whether or not to apply a financing not linked to costs model. The EMFF should not impose this either.
Row 275ca	We don't support providing additional specific objective for temporary storage, but we suggest complementing the existing specific objective in point 1 (b) with addition for temporary storage.