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NOTE

From: General Secretariat of the Council

To: Delegations

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Subject: Proposal for a Council Regulation fixing for 2022 the fishing opportunities for certain fish stocks and groups of fish stocks applicable in Union waters and for Union fishing vessels in certain non-Union waters

- Comments from Portugal

Delegations will find in the Annex written comments from Portugal on the above-mentioned document.

PORTUGAL

Notes from Portugal on the proposed Regulation concerning fishing opportunities for 2022

The Portuguese delegation wishes to thank the Commission for the current proposal, and reaffirms the national commitment to maintain the sustainability of the resources, which we know the Commission to recognize.

In general, we continue to support a broad approach to the establishment of fishing opportunities, taking into consideration not only the sustainability of the resources, but also of the fisheries as an economic endeavour, and the human communities which exploit the resources. It is not acceptable to us, or any members of the human fishing communities, if only the scientific analysis of the conditions of the animal populations are taken into consideration, regardless of the scientific reasons that may underlie the decisions.

We hereafter present specific considerations for the three most important cases of the stocks listed by the Commission:

1 - HKE/8C3411 – Hake

We propose a roll-over for this stock, as we have supported in a recent letter sent to the Commission by the concerned MS.

This stock is taken in multispecific fisheries. Along the years, Portugal made an important financial commitment, and dedicated significant scientific human resources to the collection and analysis of data of this species. Simultaneously, there has also been a significant commitment made by the fishers themselves, who have abided by the scientific decisions, in order to improve the condition of the resource. It is disheartening, in the least, to see it classified in category 3, after this immense effort. To make the case worst, it seems upon closer examination, that the motivation behind the demotion from category 1 to category 3 is much more technical and operational than biological.

Therefore, we positively cannot accept that the economic and social considerations may be sacrificed for an inadequate capacity to assess the stock. We sincerely hope that the benchmark scheduled for next year is able to resolve this matter in the swiftest way possible.

2 - JAX/09 - Horse mackerel

The ICES MSY approach suggest a 143 505t TAC. However, the Commission inexplicably opts for one of the alternative scenaria, pushing forward a 102 796 t proposal (107 460 t before the *de minimis*) based on an undiscussed (and least approved), management plan. Furthermore, this TAC results in a 16% reduction when compared to 2021. We cannot understand the position of the Commission in regards to this proposal, and cannot accept the choice made, wishing the Commission to be coherent with the MSY approach for all stock TAC proposals. If the MSY approach is followed, the TAC will be 16,6% higher than in 2021.

3 - SOO/8CDE34 – Sole

The TAC must reflect the assemblage of species in the stock (SOO) and not just the ICES proposal for common sole.

We therefore propose a roll-over, taking into consideration the historic mix of species expected to be represented in the stock, and the importance that those fisheries represent for Portugal.
