



Council of the
European Union

Brussels, 23 November 2021
(OR. en)

**Interinstitutional File:
2021/0345(NLE)**

13844/21
ADD 3

LIMITE

PECHE 427

NOTE

From: General Secretariat of the Council

To: Delegations

No. Cion doc.: ST 13316/21+ ADD1+ ADD2

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 Estonia

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

ESTONIA

Preliminary comments by Estonia on 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

Estonia welcomes the Commission proposal and acknowledges that work on the proposal is still ongoing. Hence, we would like to make a few preliminary comments. As a general note, Estonia supports a science-based approach and welcomes decisions made on the basis of MSY advice wherever it is possible.

Regarding TACs and quotas we have a small comment regarding NAFO 3M cod quota. Namely, our calculations show a share of 45,3 t for Estonia which would then be rounded to 45 t. The difference seems marginal, but at such quota levels every tonne is precious. We would kindly ask the Commission to check the relevant calculations to make sure there are no errors.

Secondly, we would like to stress the importance of having timely information on sensitive issues to facilitate discussions that would actually help move forward. In this regard we would very much welcome any new information regarding provisions on eel and having discussions on the substance in the Working Party of Fisheries Policy before the December council.
