



Council of the
European Union

Brussels, 24 November 2021
(OR. en)

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

13844/21
ADD 6

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 Germany

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

GERMANY

**Comments by Germany on the proposal of the Commission
for the Fishing Opportunities Regulation for 2022**

Germany would like to thank the Commission for the early submission of the proposal for a regulation fixing for 2022 the fishing opportunities. Due to the ongoing international negotiations and consultations, Germany can make only a few, non-conclusive comments at this point:

General comment:

With regard to TAC deductions, Germany advocates for uniform rules applied by both the European Union and the United Kingdom. It is necessary to ensure a level playing field in this respect. The calculations shall also take into account the survival rates evaluated by STECF for individual species.

Article 12:

The article on remedial measures for cod in the North Sea is currently in square brackets. Due to its poor conservation status, Germany is in favour of a continuation of the spatial and technical measures. At the same time, however, the effectiveness and compliance with the measures should also be reviewed in 2022, as no substantial improvement in the situation can yet be observed. We also support the ambition of agreeing on joint actions with the United Kingdom and Norway, if possible. Uniform and decisive measures could, on the one hand, have a positive impact on the stock situation and, on the other hand, would guarantee a level playing field between the fleets.

Article 47a:

Germany welcomes the prolongation of the provisional mechanism for the transfer and exchange of quotas with the United Kingdom and reiterates the importance of such a mechanism. We would like to refer to the comment already submitted on occasion of the negotiations with the United Kingdom that such a mechanism should also apply in the case of preliminary quotas.

European eel:

The state of the eel stock is worrying and, according to the current ICES recommendation, outside safe biological limits. In the Commission's announced proposal on possible future management measures under the TAC and Quota Regulation, we also expect an explanation from the Commission on how the proposal is compatible with the Eel Regulation (EC) No 1100/2007.

Germany reserves the right to submit further comments on the proposal and to the upcoming Commission's non-papers.

