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**PECHE 463**

**NOTE**

From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	ST 11955/21 + ADD 1 PECHE 312
Subject:	Council Regulation fixing for 2022 the fishing opportunities in the Mediterranean and Black Seas - Comments from Italy

Delegations will find attached written comments by the Italian delegation on the above-mentioned document.

### Comments from Italy

As regard the discussions on fishing opportunities 2022, at this stage Italy cannot express its final position on the document ST 13799/2021 since a political discussion is still ongoing especially with regards to the implementation of the WestMed MAP. However, as preliminary comments Italy would like to include a specific paragraph in the section related to the Adriatic Demersal MAP on the possibility for MSs to transfer effort quota amongst the fleet segments according to national conversion factors as foreseen in paragraph 3 of the Recommendation GFCM/44/2021/1.

We suggest the following paragraph: *“MSs may amend their fishing effort allocations by transferring fishing days across fishing effort groups of the same geographical area and/or gear, provided that it applies a national conversion factor which is supported by the best available scientific advice”*.

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