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From:	General Secretariat of the Council
To:	Delegations
No. prev. doc.:	ST 5350/1/20 REV 1 PECHE 22 CODEC 33 CADREFIN 7
Subject:	Proposal for a Regulation of the European Parliament and of the Council on the European Maritime and Fisheries Fund and repealing Regulation (EU) N° 508/2014 of the European Parliament and of the Council (EMFF)

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

EMFF – Belgian comments on the 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 (5350/1/20/rev 1)**

Belgium wishes to thank the Presidency for the continuous efforts to reach a compromise on the mandate. In general Belgium supports the GA as much as possible. Belgium feels that the input from the EP is very similar, but too much in detail or not in accordance with the flexibility approach that “allows what is not mentioned”. This said, some interventions are both promising and worth considering.

Specific observations:

- Line 77a and b: no support to add the recreational fisheries.
- Line 89: Belgium prefers not to include restoration.
- Line 91: Belgium prefers not to include specific descriptions as “carrying capacity”.
- Line 100: Belgium supports the use of a percentage but insists that the exact amount should be used too “in brackets”.
- Line 161: Belgium supports the 5 year period.
- Line 175: Belgium fully supports the introduction for young fishermen/aquaculture.
- Line 184f: Belgium supports the flexibility to refer to selectivity (although this is part of the CFP).
- 281a: Belgium does not support the flexibility towards the EP proposal. This might be counterproductive regarding the expected use of budget.
- 281c: Mild flexibility towards the intention of the EP as this could lead to misuse of budget through all kind of associations/groupings.
- 285: Belgium does not support the flexibility towards the EP proposal.
- 297a: Belgium does not support the flexibility towards the EP proposal. No uptake of specific goals.
- 337c: No flexibility to accept reporting twice a year.
- 429: Belgium does not support any further tampering with the indicator system.
- 433: Belgium does not support any further tampering with the annex.