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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 Czech delegation on the above-mentioned document.

ANNEX

Comments of the Czech Republic 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 related to document 5350/1/20

General comment: The Czech Republic would like to reiterate some of the main principles, which the new EMFAF Regulation should fulfil in order to ensure the development of fisheries and aquaculture sector in the EU: simplicity, coherence and flexibility for MS to address their individual needs. We believe that this should also be the principles, which should be kept in mind during the trialogues with the EP.

Row 86 (Article 3(2), point 15)

In general, the Czech Republic can agree with the flexibility towards the EP amendment, nevertheless it is necessary to ensure the coherence throughout the definition. Currently, the second part proposed by the EP only mentions marine ecosystems. Omission of inland/freshwater systems might lead to confusion about the definition of the sustainable blue economy, which includes all Union waters.

Row 281b (Article 24 (1b))

From the Czech Republic´s point of view, EP´s proposal is a step in the wrong direction, which would limit cooperation between small producers in MS as the Czech Republic. However, the intention should be the opposite as EU needs to motivate producers to create and join new POs and thus increase their competitiveness. Therefore, it should be up to MS to decide the level of support for POs. For this reason, the Czech Republic cannot support PRES proposal and considers that the EP text should be rejected. Currently, there is no PO in the Czech Republic and the low level of support is one of the reasons.

Row 337c (Article 37(2)c)

According to requirements set in the Common Provision Regulation, the Member States will be already obliged to report financial data twice a year and aggregated data on indicators four times a year. Thus, the reporting frequency will significantly increase compared to current programming period. This will ensure a sufficient level of information on the Funds implementation progress.
In addition, detailed data on operations will be reported to the Commission based on the EMFAF draft regulation. This level of monitoring is very demanding and creates an additional administrative burden which is not proportionate regarding the amount of EMFAF budget allocated.
In principle, the Czech Republic does not agree with the EP amendment that increases the frequency of reporting data on EMFAF operations. However, in the spirit of compromise, we can support the draft mandate for row 337c.