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From:	General Secretariat of the Council
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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 Estonian delegation on the above-mentioned document.

Written comments of Estonian delegation on doc 5350/1/20 REV1.**Block 1****Row 90, Article 4, first paragraph, point (2)**

We are not convinced that adding reference to food security only in case of Union Priority 2 is correct. In our opinion, also, Union Priorities 1 and 3 are potentially contributing to food security and therefore a general reference in the recitals seems more appropriate.

Row 91, Article 4, first paragraph, point (3)

The notion of ecological carrying capacity could be included in the recitals, not in the definitions or article.

We prefer the PGA and cannot agree with the drafting proposed by PRES. It seems that the wording proposed by PRES changes the intention of it by shifting the focus away from fishing and aquaculture communities.

In the Working Party, MS-s expressed flexibility to include the reference to “islands” either to Article or in the recitals.

If flexibility is needed, we could agree with following wording: "***Enabling a sustainable blue economy in coastal, island and inland areas and fostering the development of fishing and aquaculture communities***". Such wording would be also in line with the text in Article 26 (2a). Moreover, it should be acceptable also for the EP, since substantial part of financing under CLLD has been directed to the small-scale and inland fisheries.

The EMFF and national OP-allocations are relatively small and therefore it should be possible to concentrate the support. Moreover, it should be reminded that until now, the CLLD has been important tool to deliver support for SSCF. For example according to the FARNET Technical Report (“Providing information on present and future EMFF support to small-scale coastal fisheries through FLAGS“, June 2017), FLAGS where SSCF was potentially present devoted around 30% of their budget to support that segment of the fleet.

Row 128b, Article 9(3a), introductory part

We do not support reference to the Annex V of the CPR. Moreover, since not all MS-s have such sector, the text should state that this is needed only “where applicable”.

In order to highlight the importance of the small-scale fisheries, we could also agree with a specific reference to it under Union Priority 3, for example in the Article 26.

Previously the CLLD method has been addressing substantially small-scale fishing. The details can be obtained from a relevant FARNET study.

Row 184, Article 14(1)

The reference to MSY, selectivity etc should be included in the recitals, as proposed by PRES in rows 184a and 184f.

Row 337c, Article 37(2c)

The reporting deadlines should be aligned with the reporting deadlines agreed in the CPR Article 37. According to PGA of CPR the deadlines are 31 January and 31 July, but EP proposes 31 May and 30 November.

Alignment of these dates will decrease the administrative burden, by allowing to automatically generate the reports required by CPR based on the Infosys reports. It will also ensure the consistency of data between these reports.

Row 429 (approach for Annex I)

SSCF indicator. The support granted for vessels is and will be limited also in the future. Therefore, this indicator does not show correctly the EMFAF contribution to the development of SSCF. It will exclude the operations for adding value, diversification and support granted using CLLD.

Therefore, we propose an alternative indicator: ***“CI 11 - No of SSCF fishermen benefitting from EMFAF support”***.

Other provisions

Row 85, Article 3(2), point (14)

EP proposes to add to the definition of „small-scale coastal fishing“ also *“fishing on foot and shellfish gathering”*. We can agree with that, if they accept also inclusion of inland fishing.

Equal treatment of inland and coastal fisheries is important to us. For example, in case on engine replacement the inland vessels that are treated in same way as the vessels over 24m on sea. The inland fishing and fishing without a vessel, such as ice fishing is very similar to small-scale coastal fishing – the activity is in general carried out by individual fishermen, the boats and gear used are the same, some species targeted are the same.

Row 161, Article 12(2)

We can agree with EP proposal to shorten the period to 2 years. This decreases the administrative burden and increases the attractiveness of EMFF support.

Row 175, Article 13, first paragraph, point (f)

It seems that Article 16(3a) of PGA covers only transfer of fishing vessels and does not cover the transfer of undertaking to young fishermen and aquaculture producers. In addition, it should be clearly established that this does not apply to the FI-s in form of equity.

203b, Article 16(1), point (aa)

We agree with PRES, that there is no support for the text proposed by EP. However we should try to clarify the intention of the EP (“the reclassification, renewal and resizing of vessels, when they are clearly obsolete, making it possible to improve fishing conditions and increase periods spent out at sea.”). In general, we can agree with granting support to modernise vessels, if it does not negatively affect fish resources.

Row 248, 249, Article 20, Article 20(1)

We are flexible to inclusion of “*dissemination*”.

Row 281a, Article 24, first paragraph a

Advance payments – should be possible for all operations, especially for operations implemented by SSCF, NGO-s etc and non-productive operations such as collection of litter, etc.

281b, Article 24, first paragraph a and 281c, Article 24, first paragraph c

Why is PRES signalling flexibility here? The Article 22a (3) (row 275f) in the PGA covers the objectives of Common Market Organisation, including production and marketing plans.

We do not support the idea of inclusion the measure-based rules in the Regulation.

Row 283, Article 25(1)

We can agree with EP proposal. Our sector has been using storage aid due to the market disruptions due to politically motivated market disturbances on eastern markets.

Row 284, Article 25(2)

The EP proposes not to limit the support for large enterprises to financial instruments only. We support this proposal. However, instead of listing here all forms of support, we propose to delete this provision (article 25 paragraph 2).

Row 301, Article 29(3)

This Article depends of CPR negotiations. If the relevant Article in the CPR is modified as proposed by EP, we need to reinstate this provision.