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NOTE

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 Latvian delegation on the above-mentioned document.

Written comments by the delegation of LATVIA on the EMFF 4-column document

(doc. 5350/1/20 REV 1)

Block 1

Row	Written comment by the delegation of LATVIA
128b	We cannot support the text proposed by the Presidency, as long as it contains a reference to Annex V of the CPR. Annex V of the CPR, after the completion of the Trialogues, still contains all the content of an action plan for the small-scale coastal fleet. In our opinion, CPR in general should not contain fisheries fund-specific rules in it, especially at that level of detail. We are asking to delete the reference to Annex V of the CPR.
143	We do not support the creation of a new paragraph (ga) because we believe that paragraph (e), that is Row 141 of this document, already includes an assessment of socio-economic and environmental sustainability aspects. Duplication of information should be avoided, therefore we are proposing to delete paragraph (ga).
184	Maximum sustainable yield (MSY) and elimination of discards are among the objectives of the Common Fisheries Policy (CFP) set out in Article 2 of the CFP Regulation. As Row 184 already refers to all CFP objectives in its entirety, there is no need to highlight these 2 objectives separately. However, we can be flexible and support the PRES proposal.

337c	We strongly maintain our position as regards the submission of Infosys data to the Commission once a year only (as agreed in the Council's PGA). We would like to outline that for other EU funds the Commission has never even proposed in its initial proposals for the Regulations such a detailed reporting requirement. We also emphasize that, in accordance with the Provisional Common Understanding on CPR, types of interventions have also been introduced for the EMFF and data at types on interventions level will have to be reported 4 times a year. Currently, the EMFF has 10 specific objectives and each specific objective should be divided into at least 2 types of interventions. For a small fund as EMFF, this is a very fragmented breakdown. We are of opinion that it is enough if the CPR reporting requirements which are also applicable to the EMFF, are supplemented by Infosys reporting once a year only.
429	We are flexible as regards the changes proposed by PRES to the indicator titles.

Comments on the rest of the provisions

86	We are flexible as regards the changes proposed by the PRES.
96	We support the text proposed by the PRES.
100	We support the text proposed by the PRES.

238	In particular, we support Parliament's proposal to delete paragraph 4 as it deletes the restrictive 6-month period for which the temporary cessation support can be granted. A 6-months period throughout the programming period up to 2027 is far from enough. We would like to stress that already in the current programming period 2014-2020 we are facing problems with a similar restriction. In one-years' time, i.e., during 2019, a 6- months support period has already been exhausted due to the fisheries crisis in the Baltic Sea. It is clear that 6- months period is not enough for the whole programming period.
433 (Annex III Row 1)	In particular, we support Parliament's proposal to increase the co-financing rate to 55% in Row 1 of this Annex. The proposed co-financing rate should be applied to Row 1 of Annex III of the Council's PGA, which covers the first acquisition of a fishing vessel and the replacement or modernization of engines.