



**COUNCIL OF
THE EUROPEAN UNION**

**Brussels, 16 June 2006 (20.06)
(OR. en,el)**

**Interinstitutional File:
2005/0201 (CNS)**

**9247/06
ADD 5**

LIMITE

PECHE 152

PUBLIC

NOTE

from : Permanent Representation of Greece to the European Union

to : General Secretariat of the Council

No. Cion prop. : 13139/05 PECHE 203 – COM(2005) 472 final

Subject : Proposal for a Council Regulation establishing measures for the recovery of the stock of European eel

Delegations will find attached written comments from Greece on the above subject.

SUBJECT: *Comments on the draft Regulation establishing measures for the recovery of the stock of European eel*

Ref.: Note to Delegations (225/06)

Article 2

The proposed reduction of the fishing period, so that the fishing effort is scaled down by 50%, cannot be implemented in the case of eel originating from intensive or semi-intensive farming systems in leased areas of lagoon because in these areas there is no "active fishing" but eel are caught from permanent collection installations.

Article 3

- The proposed period of validity of the derogation (until 30 January 2007) should be combined with and harmonised with the corresponding dates in Article 5.
- In the conditions set out in this Article, the possibility of fishing for small eel in order to meet aquaculture requirements should be added.

Article 7

The proposed date for communication of plans to the Commission by the Member States is very restrictive and we shall not be ready to draw up and implement plans by the fixed date given that they will still be under discussion.

In addition, a Directive is preferable to a Regulation, as most delegations note in the comments on Article 6.

Article 8

The unilateral application of Management Plans by the Member States in the case of international river basins shared with third countries is not always an effective solution for the proper management of stock.

Article 11

The application of Chapter V (control and enforcement) of Regulation (EC) No 2371/2002 should be clarified in the case of fishing in inland waters by inland water vessels which are not included in the Community fishing fleet.

HEAD OF DIRECTORATE-GENERAL

A. PALAIOKOSTAS

Copy to:

1. Office of Mr Avgoula, Secretary-General
2. Office of Director-General
3. Sea Fisheries Directorate
Section 2
4. Aquaculture and Inland Waters Directorate
Section 2
