



Council of the European Union  
General Secretariat

Brussels, 13 July 2022

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2018/0193 (COD)**

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WK 10214/2022 INIT

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#### NOTE

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From:	General Secretariat of the Council
To:	Delegations

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N° prev. doc.:	WK 9750/22
N° Cion doc.:	ST 9317/18

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Subject:	Proposal for a Regulation of the European Parliament and of the Council amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control - Table Sequence 11 in view of the trilogue on 14 July 2022 - Comments by the Slovenian, Danish, Greek, Dutch, Maltese, Swedish, Estonian, Italian, Finnish and German delegations
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Delegations will find attached written comments by the Slovenian, Danish, Greek, Dutch, Maltese, Swedish, Estonian, Italian, Finnish and German delegations on the above-mentioned document.



REPUBLIC OF SLOVENIA  
**THE MINISTRY OF AGRICULTURE, FORESTRY  
AND FOOD OF THE REPUBLIC OF SLOVENIA**

FOOD AND FISHERIES DIRECTORATE

Dunajska cesta 22, 1000 Ljubljana



Date: 12. 7. 2022

**Subject: Slovenia's comments on the Proposal for a Regulation of the European Parliament and of the Council amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control - Table Sequence 11 in view of the trilogue on 14 July 2022 – doc. no. WK 9750/2022 INIT**

Slovenia would like to thank the Czech Presidency for the preparation and presentation of the compromise proposal.

Slovenia already has a functioning system of daily, weekly and annual permits for sports and recreational fishing at sea issued per person, which functions well. The permits include the obligation to subsequently report catches and on this basis, data on sports and recreational fisheries are sent to Eurostat once per year for the previous year. Also, in Slovenia, it is not allowed to use fishing gears that are used in commercial marine fishing for either recreational or sports fishing at sea.

Taking this into account, the proposal in line 514 for flexibility for a “registration, licencing or alternative system for recreational fisheries using a vessel” seems acceptable. However, care should be taken not to imply that such a system would need to be vessel-based (as Slovenia already has a system of permits for recreational fisheries at sea, with permits issued per person and not per vessel).

Also, taking this into account, there is an issue regarding compromise proposal in line 515 i.e. “Flexibility to accept catch reporting on catches made with the use of vessels”, as Slovenia already has a functioning system of reporting catches made in recreational fishing based on fishing permits (the catches have to be filled in on the permit and returned to the authority that issued the permit). A new methodology yet to be determined by the Commission would mean a substantial change for the Slovenian system of controlling and reporting catches from recreational fishing, particularly taking into account the already existing provisions of Data Collection Framework (DCF). If this proposal implies that data are to be sent for the current year, this will imply substantial changes in methodologies for collection of data on sports and recreational fisheries, particularly taking into account the existing provisions of DCF.

In lines 515 and 523, Slovenia agrees with the rejection of the proposal to introduce electronic reporting of catches of recreational fishing.

For the reasons mentioned above, Slovenia cannot agree with the current compromise proposal in line 515a.

Line 524: this proposal would represent a substantial change to the current Slovenian system of monitoring recreational fisheries at sea, because currently, a vessel can be chartered and the fisheries inspection can simply check whether all persons on board have their recreational fishing permits. Under the new proposal, a system would have to be introduced for tracking any vessel that has been chartered for recreational fishing, which would represent a disproportionate administrative and financial burden, considering the small size of Slovenian recreational fisheries, which is why we cannot support it.

Line 525: in Slovenia, the use of commercial fishing gears in recreational fisheries is already prohibited. Thus, mostly only hooks or similar equipment are used for recreational fishing. We are interested in hearing an explanation on EP proposal how a single hand-held line with a single fishing hook should be marked (instead of this, we propose a distinction is made between gears normally used for commercial fishing and fishing equipment such as hooks which is normally used for recreational fishing).

## **Comments from the Danish delegation to**

### **4-column document regarding**

#### **Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control 2018/0193(COD)**

Doc: WK 9750/2022

#### **General comments**

Denmark appreciates having received the above-mentioned document for comments.

Negotiations have taken place under the assumption that nothing was adopted before everything was adopted. Thus, Denmark reserves its position on the proposal as regards its final position to the whole proposal. Furthermore, Denmark has a general scrutiny reservation to the document as time was very short for analysing this.

In general, Denmark can support the proposal of the Presidency to amend the general approach of the Council. Where Denmark has supported to give the Presidency flexibility to explore possible compromises, we, however, enter a reservation as regards the final outcome. Denmark has the following specific comments to the general support.

#### **Detailed comments**

##### **Ad row 41**

Denmark still has a considerable concern about the administrative and economic consequences of the burden, which is imposed on Member States. We find that it should be clarified that the system, which is to be introduced, should be adjusted as to the impact of recreational fisheries on the state of the different stocks. This should also appear in the recital. Thus, Denmark can only grant the Presidency flexibility to accept a wording of the recital as proposed by the Commission, if this is included. Furthermore, we do not think that it should be allowed that fishing vessels are used for recreational fisheries. Therefore, references to this and pesca-tourism should be deleted.

##### **Ad row 42**

Denmark can grant the Presidency flexibility to accept the recital as proposed by the Commission.

##### **Ad row 42a**

Denmark can support the Presidency.

**Ad row 149**

Reference is made to the Danish comment to row 41. Denmark can support the rejection of the Presidency of the proposal of the Commission on this row so that the General Approach of the Council is defended.

**Ad row 149a**

From Danish side, we have opposed the proposed amendment by the European Parliament. We still do. Therefore, we cannot grant the Presidency flexibility to include a specific definition and a recital about pesca-tourism, if agreement about this is reached. We do not think that it is a good idea that fishing vessels can be used for recreational fisheries for control reasons.

**Ad row 510**

Denmark reserves its position as regards a reworded text, until we have had the opportunity to deal with a concrete proposal.

**Ad row 512**

Denmark supports the position of the Presidency to defend the General Approach of the Council.

**Ad row 513**

Denmark can grant the Presidency flexibility to agree to the Commission proposal.

**Ad row 514**

From Danish side, we cannot grant the Presidency flexibility to accept a registration, license or alternative system for recreational fisheries, where a vessel is used. It would be an insuperable administrative burden to handle this.

We can grant the Presidency flexibility to agree to a general provision on informing recreational fishers about Union conservation measures.

Furthermore, we can support the Presidency in defending the General Approach of the Council as regards the proposal of the European Parliament on sanctions in this area.

Finally, we can support the Presidency in rejecting the amendment proposal of Commission.

**Ad row 515**

Denmark wishes that the Presidency shall defend the General Approach of the Council. It is not acceptable that requirements about catch registration for recreational fisheries in general is introduced. As this row concerns data collection and not catch reporting, we cannot grant the Presidency flexibility to agree to a more frequent reporting to the Commission. Finally, we can support the Presidency's rejection of the amendment proposal of the Commission.

**Ad row 515a**

From Danish side, we wish to maintain the General Approach of the Council without changes to the scope. Finally, we can support the Presidency proposal to reject the amendment proposal of the Commission.

**Ad row 516**

Denmark can support the Presidency in defending the General Approach of the Council. Furthermore, we can grant the Presidency flexibility to propose drafting, which clarifies that the provisions only apply to coastal Member States.

**Ad row 517**

Denmark can support the Presidency in defending the General Approach of the Council. Furthermore, we are open to accept daily catch reporting for this group of recreational fishers, who are obliged to use electronic catch reporting.

**Ad row 518**

Denmark can support the Presidency in defending the General Approach of the Council.

**Ad row 519a**

Denmark cannot grant the Presidency flexibility to accept a provision about pesca-tourism in the Control Regulation, cf. our comments to row 149b.

**Ad row 520a**

Denmark can grant the Presidency flexibility to withdraw the General Approach of the Council and accept the proposal in rows 513 and 516 that land-locked Member States are not covered by the rules.

**Ad row 521**

From Danish side, we do not think that there is a need to grant the Presidency flexibility to accept to give the Commission implementing powers, cf. our comments to rows 522a, 524 and 525.

**Ad row 522**

Denmark can support the Presidency in defending the General Approach of the Council.

**Ad row 522a**

Denmark cannot grant the Presidency flexibility to agree to the proposal of the European Parliament.

**Ad row 524**

Denmark cannot grant the Presidency flexibility to accept to the proposal of the European Parliament. We can support the rejection of the proposal of the Commission.

**Ad row 525**

Denmark cannot grant the Presidency flexibility to accept the proposal of the European Parliament, nor limited to marking of gears. We do not think that there is a need to regulate the marking of gears at EU level, as recreational fisheries are typically coastal fisheries. We can support the rejection of the Commission proposal.

**Ad row 526**

Denmark cannot grant the Presidency flexibility to amend the General Approach of the Council.

**Ad row 527**

Denmark cannot grant the Presidency flexibility to amend the General Approach of the Council.

**Ad row 527a**

Denmark can support the Presidency in rejecting the proposal of the Commission. As mentioned earlier, Denmark is against that fishing vessels are used for recreational fisheries. For this reason, the proposal of the Commission is obsolete.

**Ad row 1318**

Denmark can grant the Presidency flexibility to accept that rules on recreational fisheries not become applicable until 48 months after the entry into force of the Regulation.



**ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ  
ΥΠΟΥΡΓΕΙΟ ΑΓΡΟΤΙΚΗΣ ΑΝΑΠΤΥΞΗΣ  
και ΤΡΟΦΙΜΩΝ  
ΓΕΝΙΚΗ ΔΙΕΥΘΥΝΣΗ ΑΛΙΕΙΑΣ  
Δ/ΝΣΗ ΑΛΙΕΥΤΙΚΗΣ ΠΟΛΙΤΙΚΗΣ & ΑΞΙΟΠΟΙΗΣΗΣ  
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**ΘΕΜΑ: «Δυνατότητα Ευελιξίας στους Τριλόγους για το σχέδιο Κανονισμού Ελέγχου»**

**ΣΧΕΤ.:** Το υπ' αριθμ. WK 9750/2022 INIT έγγραφο της Γραμματείας του Συμβουλίου

Σχετικά με το θέμα, και όσον αφορά την δυνατότητα περαιτέρω ευελιξίας του Συμβουλίου κατά τον προσεχή τρίλογο της 14<sup>ης</sup> Ιουλίου για τον Πίνακα Αλληλουχίας 11 στο σχέδιο του Κανονισμού Ελέγχου, σας γνωρίζουμε ότι μπορούμε να δείξουμε ευελιξία σε όλα τα σημεία, πλην του σημείου **514**, όπου συμφωνούμε μεν για ευελιξία, αλλά μόνο όσον αφορά την ερασιτεχνική αλιεία που διεξάγεται με χρήση σκάφους.

**Η ΠΡΟΪΣΤΑΜΕΝΗ ΤΗΣ ΓΕΝΙΚΗΣ ΔΙΕΥΘΥΝΣΗΣ**

[ με υπογραφή ]

[REDACTED]

**Ε.Δ.:**

- Γενική Δ/νση Αλιείας
- Δ/νση Αλιευτικής Πολιτικής & ΑΠΑΠ
- Δ/νση Ελέγχου ΑΔ & Π

**SUBJECT: "Possibility of Flexibility in the forthcoming Trilogy for the draft Control Regulation"**

**REF .: Document No WK 9750/2022 INIT of the Council Secretariat**

On this subject, and with regard to the possibility of further flexibility of the Council in the forthcoming trilogue of 14<sup>th</sup> of July for the Table Sequence 11 on the draft Control Regulation, we inform you that we can show flexibility in every point, **except** the point **514**, where we can agree for flexibility, as soon as this concerns recreational fisheries using a vessel.

**Written comments from the Netherlands on compromise text for the Control Regulation concerning recreational fisheries**

Date: 12 July 2022

The Netherlands would like to thank the Presidency for all their work on the Control regulation and for keeping the Member States involved during the negotiations.

With regard to the registration of recreational fisheries and catches, the Netherlands has an overall concern on the proportionality of establishing a registration or licencing system for recreational fisheries in general. The Control regulation establishes Union system for control, inspection and enforcement to ensure compliance with the rules of the common fisheries policy. The CFP only covers some specific conservation measures applicable to recreational fisheries, related to stocks under threat. Only recreational fishers involved in fisheries subject to Union conservation measures which apply specifically to recreational fisheries, have to be registered.

The Netherlands would therefore urge the Presidency to keep to the GA as much as possible. The Netherlands can be flexible towards a registration system for vessels but only for those vessels equipped with fishing gears similar to those used in commercial fisheries. Furthermore the Netherlands can be flexible towards provisions on pesca-tourism.

MALTA'S WRITTEN COMMENTS FOR PROPOSAL FOR A REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL AMENDING COUNCIL REGULATION (EC) NO 1224/2009, AND AMENDING COUNCIL REGULATIONS (EC) NO 768/2005, (EC) NO 1967/2006, (EC) NO 1005/2008, AND REGULATION (EU) NO 2016/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL AS REGARDS FISHERIES CONTROL

Point No.	Comment
General Comment	Malta would like to know on what level/means/basis the "effective control" of pesca-tourism, charter vessels and diving activities, is proposed to be based.
524	MT opposes the use of tracking of vessels used for pesca-tourism and recreational fisheries, fishing charter vessels
525	MT is against point number d) "the control and marking of gears used for recreational fisheries in a simple and proportionate manner."

In the case of recreational fisheries in Malta, one has to note that the Department of Fisheries and Aquaculture has over 2,500 vessels registered as recreational. Furthermore, the DFA can issue Authorisations for vessels registered with Transport Malta set as recreational (registered as S and Valletta) for specific targeted fish species.

In Malta we issue authorisations on BFT, ALB and DOL. This means that Transport Malta recreational vessels will amount to a minimum of further 10,000 vessels. This is impossible and will incur a huge administrative burden on control, monitoring and reporting. The control and monitor of marking recreational gear will compliment all the relative issues mentioned.



12 July 2022  
N2022/

**Ministry of Enterprise and Innovation**  
Department for Rural Affairs, Division for Fisheries,  
Game Management and Reindeer Husbandry



## Written comments from Sweden on document WK 09750/2022

Sweden appreciates having received the document WK 09750/2022 for comments. Due to limited time provided, Sweden has chosen to put forward only a few comments.

### *Inclusion of pesca tourism in article 55*

This is a new issue to Sweden that we need to analyse further. However, we see problems with the definition of the concept as well as issues with the practical control aspects.

### *Row 514 – 515 on a license system*

Sweden doesn't support a registration or license system for recreational fisheries using a vessel.

Sweden cannot see how it would be possible to separate vessels that seldom or maybe every second year on one or two occasions are used for recreational fishing activities, from vessels that more often are used for fishing. We cannot see any purpose in registering a large number of vessels seldom used for fishing activities. This would cause a huge unnecessary administrative burden for the authorities as well as for individuals.

In Sweden during 2021, a total of 1.5 million people aged 16–80 years went fishing at least once, 1.0 million men and 0.5 million women. The total number of fishing days during 2021 was 12.4 million: 8.6 million days in lakes and rivers and 3.8 million days in the sea. Roughly half of these fishing days were from a private boat or a tour boat. Most of the recreational fishing takes place on non-commercial species such as perch, pike, pikeperch, whitefish and trout.

## **Estonian written comments on Proposal for a Regulation as regards fisheries control: Presidency proposal doc WK 9750/2022 INIT**

Estonian delegation would hereby like to present comments to sequence 11 on recreational fisheries. As a general note we would like to point out that the new proposals have a significantly wider scope than the relevant text in the agreed General Approach and several new proposals likely require a political debate within Member States. There has not been enough time to have these kinds of discussions, hence we are hereby reserving the right to state our final position on sequence 11 at a later stage. Nevertheless, we would like to share a few comments already.

Firstly, we cannot offer flexibility to accept provisions on pesca-tourism at this stage. We find that adding new definition on „pesca-tourism“ is unnecessary and creates additional layers for administrations to consider when creating and managing different systems and databases in order to facilitate better fisheries control. Additionally, we find that legally there should be no difference whether the person taking tourists on board is by profession a commercial fisherman or not. We also do not support EP proposal on row 519a on notifications.

Secondly, we find that using or not using a vessel is an arbitrary criterion for deciding whether a person engaged in recreational fisheries should be registered or not, or whether there should be catch reporting or not. A vessel is not a factor that affects fishing pressure in recreational fisheries. Vessels may carry different number of people on board and for a lot of the time can be used for leisurely activities other than fishing. At the same time, fishing gear (type) together with the number of users reflects fishing pressure quite well. For that reason we propose that on rows 514 and 515, registration/licensing/alternative system and catch reporting would be necessary in cases where such gears are used that fish are caught either by entangling or trapping. In case of Estonia this would mean gillnets and longlines.

Regarding registering systems and catch reporting, we would also like to note that recreational fisheries is a healthy hobby that also engages groups of people such as children, people with special needs, pensioners etc. Thus, creating extensive obligations and overregulating should be avoided at all costs.

Row 524: we cannot offer flexibility on tracking pesca-tourism vessels and fishing charter vessels.

Row 525: we would like to stick with GA

Finally, we would like to note that Member States' obligations regarding recreational fisheries are already largely covered with Data Collection Framework (DCF) Regulation and we need to look at very closely if additional provisions are really needed here in control regulation. Based on what is stated in Delegated Decision 1167/2021 on monitoring requirements for recreational fisheries and in decision 39/2022 on Annual Reports and Work Plans, it is quite clear that the list on species that should be covered with DCF in this regard is not definite. Member States are, in fact, obliged to make sure that sufficient data is collected in cases where recreational fisheries affect the development of stocks. These species are to be agreed on a regional level and we would like to point out that Regional Coordination Groups indeed cooperate highly with ICES Working Group of Recreational Fisheries Surveys.

Italy's comment on document WK 9750/22 (control Regulation)

Row 41: Text to be modified. Sanctioning system is up to Member State to be established. The pesca-tourism is not part of recreational fisheries, therefore it shall be excluded from this chapter.

Row 149b: The same comment as per row 41 regarding pesca-tourism.

Row 513: What's happen to recreational vessels flagged in non-coastal States. Are they free to operate without any rule?

Row 514: We cannot grant any flexibility without seeing the proposed text.

Row 515: Depending on the text of row 514 we could have some flexibility; on the contrary we would prefer to maintain the text in the mandate. We agree in rejecting the Commission proposal of 6.7.2022.

Row 515a: Linked with the comments on previous line 515.

Row 516: See comment to row 513.

Row 519a: The same comment as per row 41 regarding pesca-tourism.

Row 520a: See comment to row 513.

Row 521: No flexibility;

Row 522a: The same comment as per row 41 regarding pesca-tourism.

Row 524: The same comment as per row 41 regarding pesca-tourism.

Row 526: No flexibility.

Row 527: No flexibility.

## Working party on Internal and External Fisheries Policy

Written comments of FINLAND

on the proposal for a Regulation of the European Parliament and of the Council amending  
Regulations on fisheries control

(Sequence 11 in Document WK 9750/2022 INIT)

Finland thanks the Presidency for the distributed document. Recreational fisheries is probably the most politically sensitive issue in the control package in Finland, where most people are engaged in recreational fishing at some phase of their life.

Deficiencies in recreational fishing catch data and the assessment of the amount of fishing have been known for a long time, and Finland also considers that recreational fishing monitoring and catch reports should be strengthened in this regard. However, changes to the rules on recreational fishing should not cause significant additional costs or bureaucracy.

The Council General Approach was a result of difficult negotiations and as such a compromise. Therefore **the Member States must be careful and restrained in showing flexibility in the trilogues.**

In more detail, comments are as follows.

row 524: **Finland strongly opposes proposals on tracking of vessels used for recreational fishing.** It only would cause a lot of new tasks and costs without mentionable added value in the context of fishing carried out in the coast of Finland.

row 514: **It is not possible to make difference between recreational fishing carried out with or without a vessel.** A rowing boat and a light outboard motor boat are also vessels, and their registration would go beyond all reason. What is more, it is not possible to state universally that fishing with vessel would create bigger threat to fish stocks than fishing from ashore. In Finland, there is a licensing system for recreational fishers between 18 and 64 years old, and this system should be able to be kept untouched.

Flexibility ok on informing about Union conservation measures.

Sanctioning of recreational fishing should be discussed in the context of art 90, and no reference to it must be made in Article 55.

row 515: As explained above for row 514, it is not reasonable to make difference between catches got with or without a vessel. The need to strengthen catch reporting applies equally to both types of fishing, but it does not apply to very small-scale fishing targeting abundant fish species like perch and roach.

row 517: The Commission proposal is preferable as it is much clearer and avoids unnecessary registering of the fishers. In the case that MS has a licensing system for recreational fishing this would be a double registering.

row 519a: Finland reserves its position – this coin has two sides.

row 525: There is no need to have harmonised rules on marking of recreational fishing gear. Member States are capable of doing this by themselves.



# Comments of Germany on WK 09750/2022 – Sequence 11 (recreational fisheries)

12 July 2022

Germany thanks the Presidency for proposed ways forward regarding Sequence 11 of the EU control regulation in working paper WK 09750/2022.

## General remarks

In our comments below, we focus on most relevant points. We refrain from commenting on all suggested ways forward by the Presidency and reserve to comment on these at a later stage.

## Comments on specific lines

**Line 41:** The proposed recital is broad in scope in that it suggests data collection and control and sanctions for all types of recreational fishing (albeit it appears to focus to some extent on pesca-tourism or chartered vessels) and various types of fish stocks. Germany is still hesitant to accept a recital with such a broad scope (c.f. comments on lines below).

**Line 514:** Germany rejects provisions on registrations of all types of vessels involved in recreational fishing activities. This would require implementing a new system at disproportionate effort and costs relative to expected benefits.

Germany could agree however to limited provisions applying to (larger) vessels, exclusively offering angling tours on a commercial basis. These type of vessels represent a new type of vessel category, which are currently subject to touristic-business related legal regimes (i. e. not the CFP).

**Line 515 (515a):** Germany does not support general obligations to register catches, independent, if they are made from commercial or private, marine or land-based recreational fishing activities. As for provisions on vessels (line 514), this would cause disproportionate costs, inter alia for administrations.

In line with the comment on line 514, Germany could concur with effective and reasonable control provisions on stocks regulated under EU law, such as stocks with bag limits, i.e. cod or seabass.

**Line 524 (519a):** Referring to the comment on line 514, Germany is not ready to accept the suggested way forward. If at all, tracking should only apply to (larger) vessels (generally equipped with AIS) principally pursuing commercially offered angling tours (i. e. it should not apply to private or chartered vessels, which on one day might carry anglers but not the following day for instance).