Council of the European Union
General Secretariat

PUBLIC

Interinstitutional files:
2025/0235 (COD)

Brussels, 17 October 2025

WK 13909/2025 INIT

LIMITE

PECHE
CADREFIN
FIN
POLMAR
CODEC

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

NOTE

From:	General Secretariat of the Council
To:	Delegations
N° prev. doc.:	ST 11757/25
N° Cion doc.:	ST 11757 2025 COR 1 + ST 11757 2025 COR 2 + ST 11757 2025 INIT
Subject:	Proposal for a Regulation establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) […] [NRP Fund] for the period from 2028 to 2034 – Comments from Belgium, Bulgaria, Czechia, Germany, Estonia, Ireland, Greece, Spain, Croatia, Cyprus, Latvia, Lithuania, Hungary, the Netherlands, Austria, Poland, Portugal, Romania, Slovenia, Finland, and Sweden

Delegations will find attached consolidated comments from the above delegations on the above proposal.

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

Consolidated responses

Proposal for a Regulation establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) […] [NRP Fund] for the period from 2028 to 2034 – ST 11757/25 INIT

A) General comments
BE Belgium would like to express its concerns regarding the significant reduction foreseen in the budget for fisheries and aquaculture under the 2028–2034 Multiannual Financial Framework. This is particularly worrying given the many legal obligations we must meet under the Common Fisheries Policy. It is crucial that we retain the capacity to invest in and modernise the sector, and to prepare it for the challenges ahead. While the CFP is an exclusive competence of the EU, it is increasingly unclear how we can continue to address these shared challenges without adequate funding and a common set of rules. The financial framework should reflect a shared vision for the future of the sector - defining not only how, but also where we want to invest. This is essential to maintain a level playing field between fleets across Member States. Moreover, we must ensure legal certainty. Without a clear and coherent framework, we risk that certain investments may be questioned or challenged after the fact. At this stage, many elements remain unclear, and it is difficult to keep an overview of the ongoing discussion. We therefore request for more detailed information in the working party, and we believe the regulation itself should be clear and more detailed. **BG** The information provided by the European Commission on the distribution of the minimum funds for the Common Fisheries Policy raises serious concerns about how each Member State's budget will be allocated to its specific needs. In addition, the European Commission has not provided a list of interventions for which resources should be specifically reserved. These circumstances will result in Member States being faced with a choice

PUBLIC

A) General comments
between financing activities from the EU's direct policies - the Common Fisheries Policy and the security of the oceans - and supporting investments in aquaculture and processing that directly contribute to the food security of the Union's population or to ensuring a decent livelihood for communities dependent on fisheries and aquaculture. The regulation does not describe how support for fisheries is treated and what rules apply to aid granted by Member States to undertakings in the fisheries and aquaculture sector **CZ** • **In the proposal, we highly appreciate the flexibility of the scope of support, i.e., that the areas of support are not limited by an explicit enumeration, thus allowing the needs of both landlocked and coastal states to be addressed.** • However, we must express serious concern regarding the reduction of the budget for overall support of aquaculture and fisheries. Such a significant budget cut could fundamentally jeopardize the competitiveness and resilience of the sector. • We therefore request the Commission to provide detailed information regarding allocations, their distribution among Member States, and the sources of funding for the Common Fisheries Policy, so that the Commission can ensure the availability of financial resources for freshwater aquaculture, which contributes to food security and helps mitigate the impacts of overfishing. • The allocated financial resources for landlocked states with freshwater aquaculture are not sufficient and adequate to meet the established requirements. • We appreciate the Commission's explanation that paragraph 11 of Article 35 of the NRP Regulation covers all necessary activities and allows for the financing of everything that is permitted in the current programming period. However, we must note that very low financial resources have been allocated to the Czech Republic for the financing of all, or at least a significant part, of the current activities. In line with the Commission's assurances, we therefore request that a list of possible supported activities be added to paragraph 11 of Article 35 so that it is clear that all existing activities can be supported. We request that the following be explicitly stated: • Investments in aquaculture, • Investments in the processing of aquaculture and fishery and placing products on the market, • products, • Promotional campaigns, • Product, process, and organizational innovations. We also request that the word "for example" be added before the list of activities, in line with maintaining the flexibility of support.

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

A) General comments
• In the context of the NRPP, we are also concerned about an increase in administrative burden related to the mandatory use of simplified reporting methods below the threshold of EUR 400,000. • CZ is of the opinion that the European Commission should not set restrictions on the form of financing that Member States use towards recipients if the funds from the Commission are provided based on the achievement of milestones and targets, i.e., under a performance-based model. From the Czech Republic's perspective, the regulation should not prescribe the form of financing between Member States and recipients, and this decision should be left to the discretion of the Member States. • Within the fisheries sector, this would apply to almost all projects, and such an approach is not technically and administratively feasible. **DE** **Preliminary remarks:** - In principle, in GER welcomes the establishment of horizontal rules for several thematic areas; as it can contribute to a modernised and more flexible MFF with leaner structures. However, the NRP Regulation in particular also contains many provisions relevant the support of maritime sector, fisheries and aquaculture. The effectiveness of future maritime, fisheries and aquaculture funding will be decided in the interplay of MFF, NRP, performance and other regulations, not only in the draft CPF-Regulation alone. - According to the Commission communication on the MFF, as well as clarifications on the future European budget for fisheries, aquaculture and oceans of September 2025, the funding for these areas is to be drawn from different budget approaches in the future, in addition to the minimum of EUR 2 billion provided for in the CAP minimum budget approach (the non-dedicated NRP funds, the competition fund, EU Facility). At the same time, the Commission has indicated that its proposal contains all the conditions for continuing the CFP as before. All previous interventions shall still be possible in the future. GER asks the Commission to **explain from which budget approach which support measure in the areas of fisheries, aquaculture, maritime policy and implementation of the European Ocean Pact shall l be supported in the future – preferably in the form of an article-by-article allocation of types of measures or categories of intervention to the corresponding regulations in the regulatory framework**. The location of types of measures or types of interventions is to be explicitly indicated in order to provide for legal clarity and a uniform application of the regulation framework across the Member States. - The **potential funding for maritime, fisheries and aquaculture support, including the minimum amount of EUR 2 billion for the implementation of core CFP interventions, is only indicated in an Annex of the Commission's Communication relating to the MFF. How will this minimum funding allocation be implemented?** In addition, the NRP-Regulation proposal stipulates that key CFP interventions previously financed through the European Maritime, Fisheries and Aquaculture Fund (EMFAF, in particular: data collection and fisheries control) shall not be financed from the designated (CAP-)CFP-funds in the future (see Art. 10. para. 2, Art. 35 para. 11 NRP

A) General comments

Regulation). This may create **planning uncertainty and ambiguity as to the resources available for the implementation of the CFP,** including the mandatory measures contained therein.

- In **principle, GER welcomes the flexibility** resulting from the fact that the Regulation does not contain any description of support measures and their eligibility conditions. At the same time, we ask the Commission to explain how a **level playing field is to be maintained** in the light of this flexibility. **GER suggests to indicate the future interventions in the area of support to the maritime sector, fisheries and aquaculture in the regulation itself to provide for legal clarity** (see below) – in particular in light of the different budget approaches from which these interventions are to be supported.
- We would also ask the Commission to explain **how this flexible framework relates to the wider EU fisheries State aid framework** (Fisheries Guidelines, Group Exemption Regulation, de minimis Regulation). This contains, in some cases, very specific requirements for individual support measures.
- In principle, Germany welcomes the anchoring of the 'do no significant harm' approach in the regulatory framework. Due to the importance of this approach, especially in the area of tension between fisheries production and future-oriented direction of fisheries on the one hand, and marine environmental protection and the conservation and restoration of marine biodiversity on the other hand, DEU considers that a legal design of this approach in this Regulation is appropriate.
- Germany **reserves the right to carry out further examinations of this draft Regulation.**

Overall, the impression is that the drafting of the regulation focused unilaterally on marine fisheries, in particular small-scale coastal fisheries, and largely disregarded aquaculture, in particular inland aquaculture. According to the Commission's proposal, aquaculture, inland fisheries and pond farming may also be supported under other budgetary approaches in the future, such as the non-dedicated NRP funds, . However, there are no legally binding provisions in the Commission's draft regulations on this matter.
GER asks for clarification and appropriate legal anchoring also of the promotion of aquaculture (including pond farming) and inland fishing.

EE
We are currently analysing the COM-s proposals and official positions are not finalized. We have submitted several questions with regard of proposals and are waiting answers. Therefore, we can submit only initial comments at this stage.

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

A) General comments
EL We have serious reservations, although we agree in principle with its provisions, especially in regard to Articles 3 and 4, with our concerns being that the basic terms and conditions of support are contained and regulated in another Regulation (National and Regional Partnership Fund), as referred to in Articles 1 and 2. Although at first reading the specific draft appears to support the basic priorities of our Country (such as coastal fisheries, and aquaculture), we believe that the ability to manage the financial support will be significantly affected, while the start of the procedure for the payments of aid will also be delayed, as - in combination with the provisions of the National and Regional Partnership Fund - many and time-consuming changes are required in the new management process. We believe that the proposal should be re-examined in light of its co-examination of the basic terms and conditions of funding contained and regulated in the draft Regulation for the new National and Regional Partnership Fund. **ES** In the analysis of this Regulation, it is important to consider the proposal for the Multiannual Financial Framework 2028–2034 and all related regulations presented by the Commission on July 16, in a way that all of them are taking into account as a whole. As for this specific proposal, it must be said that it shows a lack of content compared to previous periods, where the specificities and exceptions of the fisheries and aquaculture sector were explicitly reflected. While this reduced regulation may have positive aspects, such as lowering administrative barriers, which could support the necessary modernization of the fleet, it also poses risks of distorting the level playing field among different Member States, as it leaves certain aspects, like the intensity of aid for each type of intervention, to their discretion. With a view to implementing the principle of better regulation and preventing normative dispersion, this Regulation should ensure a coherent and integrated legal framework. The regulatory framework governing the new MFF, and in particular the provisions applicable to the financing of the CFP, should be identified and interpreted in an integrated and coherent manner, thereby ensuring legal certainty.

PUBLIC

A) General comments
Accordingly, all provisions expressly regulating the financing of the CFP —including the relevant definitions— should be incorporated within this specific Regulation. Moreover, any guidelines or recommendations related to its implementation shall remain strictly consistent with the operative provisions and shall not extend beyond their scope, so as to ensure the clarity and predictability of the legal framework. In this context, and taking into consideration the current evaluation of the CFP, Spain reserves its right to further express its position concerning the statements made in the recitals. **HR** This proposal cannot be seen outside the context of the MFF package, or other regulations that would regulate the use of EU budget funds for financing Common Fisheries Policy (CFP) measures in the future programming period, in particular the Regulation on the European Fund for Economic, Social and Territorial Cohesion, Agriculture and Rural Development, Fisheries and Maritime Affairs, Prosperity and Security (NRPF Regulation). Given that the proposed framework for the future period, both the MFF itself and the applicable regulations (NRPF Regulation and the CFP Financing Regulation), currently contain a large number of inclarities, it is not possible to specifically discuss and present either detailed or final positions until the open issues are clarified, especially in the context of the envisaged budgetary resources for financing the implementation of the CFP, as well as the scope of the NRP plans in terms of possible CFP interventions. In this regard, we take the opportunity to make a few general comments, primarily in relation to the NRPF Regulation, which contains the most provisions related to the financing of the CFP. In the proposal for a NRPF Regulation, the CFP itself and the interventions related to the CFP are not highlighted or recognised at the level that should be higher for this important common policy, but the CFP and related interventions are mentioned under the CAP and CAP interventions. Among other things, the proposal for a NRPF Regulation lacks predefined minimum allocations for the CFP, and the interventions themselves covered by these allocations are unclear. For example, neither fisheries data collection nor fisheries control and surveillance, which form the basis for the implementation of the CFP, are mentioned in the interventions mentioned, and consequently it is not clear whether they are covered by the predefined allocations or not. Certain rules do not take into account the specificities of the CFP or are not clearly defined. For example, according to the analyses we have carried out so far, it is not clear how the national share in terms of CFP funding will be determined. The current proposal sets minimum rates by category of region (less developed, transition and developed), and it is not clear to us how the rate would be determined for CFP measures relating to fishing vessels, for example. There are also a number of concepts relevant to CFP funding that differ significantly between the different proposals. As regards the proposal for a Regulation on the financing of the CFP, taking into account the previously mentioned inclarities and open questions arising from other proposals, we would like to highlight at this point several main elements, primarily those that we consider to be unclear and that pose

PUBLIC

A) General comments
a risk of certain legal uncertainty that may arise during implementation, primarily due to different understandings and interpretations by different bodies in the management and control system. **CY** Cyprus supports the overall objectives of simplification flexibility and coherence; however, it is essential to maintain the visibility, integrity, and sectoral specificity of the Common Fisheries Policy (CFP) within the new integrated framework. The CFP must continue to operate as a distinct policy with dedicated objectives, indicators, and measures reflecting the realities of the fisheries and aquaculture sectors. This will need to be: a) Reflected both in the NRP proposal by having a reference to the CFP ringfenced amount under article 10.2.ii and a separate chapter for CFP under title V, the title of which will have to be corrected. The chapter should include an extended description of the interventions referred to in Article 35(11) of the NRP Regulation, which will be further elaborated in the sector-specific regulation of the Common Fisheries Policy (CFP). b) Reflected in the sector specific regulation of the CFP by i) clearly describing the areas of intervention to be covered by the ringfenced envelop, the non-ringfenced national envelope, the EU facility fund, the competitiveness fund, the social fund and any other possible financial resource available, ii) prescribing the continuity of the current EMFAF actions. c) Including a provision on the guidelines to be followed for preparing the NRP relevant chapter in line with the guidelines for agriculture and the European semester. 2. Cyprus also highlights the importance of: • Sustained and enhanced support for fisheries control, monitoring, data collection, and IUU prevention; • Eligibility for investments improving safety, selectivity, and energy efficiency of fishing vessels; • Concentrating on traditional fisheries, small scale fisheries and emerging blue economy activities for island states in line with the European Ocean Pact, but at the same time ensuring that funding for other blue economy or maritime sectors does not reduce available support for fishers. Overall, Cyprus supports the proposal, as long as clear objectives and principles are provided, ensuring that the implementation framework provides for the visibility of the CFP, and dedicated and fair funding access for the fisheries and aquaculture sector are within the broader NRP structure. 3. Under the NRP proposal there is a general rule on the implementation of SCOs for investments under 400.000 (article 78 of the NRP). This rule should not pertain to CFP investments as there is a disproportionate administrative burden to come up with SCOs for relatively small schemes that have

PUBLIC

A) General comments
very few beneficiaries. Therefore, since this regulation cannot contradict the NRP (article 1.2 of the NRP) a derogation for the sectoral regulation should be provided in the NRP regulation. **LV** Latvia does not support the integration of the CFP into a single fund together with other policies which seriously reduce the opportunity for clear and targeted support of the sectoral policy demands. We invite that the funding allocated for the implementation of the CFP (and other areas of the existing EMFAF) be ensured at a sufficient level, as a 62% reduction poses risks that the necessary reforms may not be feasible or will be substantially slow-dawn. Given that the CFP is a relatively small policy area, yet coordinated at the EU level through cost-intensive and complicatedly regulated mechanisms, there is a high risk that it may not receive adequate financing from the other MFF funding allocated to the Member State. We also call for the support for CFP (and other areas of the existing EMFAF) not to be included in the National Partnership Plan. A clear separate programming document with achievable CFP targets and necessary indicators should be established for this purpose, in order to reduce the extended administrative burden on Member States, significantly simplify and shorten the time required for communication with the European Commission, and avoid the involvement of coordinating authorities as foreseen in the proposed NRPP Regulation. **HU** As a matter of principle, we are opposed to the merging of CAP and CFP into a single fund. **NL** 1. The Netherlands upholds its parliamentary and scrutiny reservation 2. Budget: We've noticed that the mentioned ringfenced budget for fisheries and the Ocean Pact is not part of the legal texts of the proposal and therefore without a legal basis. 3. Do No Significant Harm – NL considers that the announced Commission guidelines on DNSH-principle can have significant impact on the approval of support interventions for fisheries. NL asks involvement of Council in the development of these guidelines. 4. Decommitment: NL is concerned about the N+1 rule, when the current N+3 rule (under e.g. EMFAF) is already challenging.

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

A) General comments
NL asks for an explaination on how the N+1 system will work in relation to the new delivery model. Given the problems that some Member States are experiencing with the N+3 system within EMFAF, can the concerns that Member States have about shortening this period be allayed? **PL** In PL's opinion, there is no justification for commencing work on the regulation in question (which is intended to specify the provisions of the NRP Fund Regulation) when so many provisions of the NRP Fund Regulation are unclear. As indicated in the second sentence of Article 1, EU support will be provided under the NRP Fund, therefore, in order to ensure effective work on the regulation in question, it is necessary to be certain about the wording of the basic provisions to which the regulation in question is to be a supplement (especially in a situation where the NRP Fund Regulation is so controversial). **SI** Slovenia believes that it should be clear from this proposal for a Regulation, as well as from the overall proposal of the NRP Fund, which activities will be eligible for co-financing by the Member States, and which activities will not be eligible, particularly as regards the renewal of fishing fleets for sustainable fishing without increasing fleet capacity. From the perspective of legal certainty, it is not acceptable that the question of which activities are or are not eligible for co-financing would be decided post-hoc on the basis of Commission guidance documents or Commission decisions. Instead, the question of which activities are eligible for co-financing and which are not should be clearly answered in the applicable legislation, i.e. either this or the NRP Regulation. This is also necessary in order to ensure a level playing field among the Member States. **FI** Finland thanks for the opportunity to send in written comments and reserves the right for further comments as the reading advances and new information comes available.

Commission proposal	Drafting suggestions	Comments
2025/0235 (COD)		

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

Commission proposal	Drafting suggestions	Comments
Proposal for a		
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL		**LV** We encourage not to rush the examination of this proposal, as it is important to first see the outcome of the overall MFF discussions and the framework of the reformed CFP (referred to in Article 22(2)(c), Article 62(1), (6), (7) and (8) of the NRP Regulation). We also call on the European Commission to launch discussions on the future CFP regulation proposal as soon as possible, since, according to the Commission's MFF Fiche No. 15, the preparation of the NRP Plans is expected to start already in 2026.
establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034	**DE** **establishing the conditions for the implementation of the Union support to the Common Fisheries Policy~~, to the European Ocean Pact~~ and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034**	**DE** The European Pact for the Ocean is a Communication from the Commission which does not have the same legally binding character as the Common Fisheries Policy or the Union's Integrated Maritime Policy. It should therefore not be named on an equal footing. Instead, MS could be given the opportunity to also support the implementation of the Ocean Pact with funds from the NRPP budget, as well as other budget approaches in the MFF where appropriate. **EE**

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

Commission proposal	Drafting suggestions	Comments
		The NRP proposal establishes „European Fund". The terminology should be coherent throughout of MFF proposals.
	LT as part of the ~~National and Regional Partnership~~ **<u>European</u>** Fund set out in Regulation (EU) […] [~~NRP~~ Fund]	**LT** National and Regional Partnership Fund not correct name of the fund
	FI establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the ~~European Ocean Pact and of the~~ Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034	**FI** The European Ocean Pact is a communication in the area of maritime policy and it should not be parallel to the CFP and IMP, as pointed out also by the Council Legal Service in WP 2/10. This should be taken into account through out the text.
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,		
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 42, Article 43(2), Article 91(1), Article 100(2), Article 173(3), Article 175, Article 188, Article 192(1), Article 194(2), Article 195(2) and Article 349 thereof,		
Having regard to the proposal from the European Commission,		

PUBLIC

Commission proposal	Drafting suggestions	Comments
After transmission of the draft legislative act to the national parliaments,		
Having regard to the opinion of the European Economic and Social Committee[1],		
Having regard to the opinion of the Committee of the Regions[2],		
Acting in accordance with the ordinary legislative procedure,		
Whereas:		**EE** Taking into account the possible changes in the main text the recitals need to be revised. It also seems that some recitals currently refer to NRP proposal rather than this.
(1) This Union support will be provided under the National and Regional Partnership Fund, in accordance with the rules governing that Fund and set out in [Regulation (EU) [NRP Fund].	**DE** (1) This Union support will be provided under the National and Regional Partnership Fund, in accordance with the rules governing that Fund and set out in [Regulation (EU) [NRP Fund] **as well as other relevant funds in the MFF framework and the rules governing those funds.**	**DE** The Commission has indicated that funds to promote and, in particular, to support the transformation of the fisheries sector, should also be drawn from other budget approaches, in particular the Competition Fund, see Article 33 ECF (decarbonisation). . **ES** With regards to definitions 26-34 set out in [Regulation (EU) [NRP Fund], our suggestion is to move those definitions from this Regulation to this one.

[1] OJ C , , p. .
[2] OJ C , , p. .

PUBLIC

Commission proposal	Drafting suggestions	Comments
		LT National and Regional Partnership Fund not correct name of the fund
(2) The Union support shall also contribute to the activities as set out in the European Ocean Pact and contribute to the Union's objective of the sustainability of our ocean, and climate neutrality target, the sustainability, competitiveness and resilience of the European Union fisheries and aquaculture sector, the sustainability, resilience and competitiveness of the European blue economy, the resilience of coastal and island communities, as well as outermost regions, and the enhancement of ocean governance and ocean observation, including through Copernicus, the Union's Earth Observation programme and its marine-related services.	**DE** 2) The Union support ~~shall~~ **also** contribute to the activities as set out in the European Ocean Pact and **shall** contribute to the Union's objective of the sustainability of our ocean, and climate neutrality target, the sustainability, competitiveness and resilience of the European Union fisheries and aquaculture sector, the sustainability, resilience and competitiveness of the European blue economy, the resilience of coastal and island communities, as well as outermost regions, and the enhancement of ocean governance and ocean observation, including through Copernicus, the Union's Earth Observation programme and its marine-related services.	**BG** It is necessary to provide financial assistance to enterprises engaged in processing, which is crucial to the Bulgarian fisheries sector. It is important that such support for the sector is provided together with such for fish and fishery products market and for the OPs. **DE** See above.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	IE The Union support shall also contribute to the ~~activities~~ objectives ~~as~~ set out in the European Ocean Pact and ~~contribute to~~ the Union's objectives ~~of~~ regarding the sustainability of our ocean; ~~and~~ climate neutrality ~~target~~; the sustainability, competitiveness and resilience of the European Union fisheries and aquaculture sector; the sustainability, resilience and competitiveness of the European blue economy; the resilience of coastal and island communities, as well as outermost regions; and the enhancement of ocean governance and ocean observation, including through Copernicus, the Union's Earth Observation programme and its marine-related services. **LT** The Union support shall also contribute to the activities as set out in the European Ocean Pact and contribute to the Union's objective of the sustainability of our ocean, and climate neutrality target, the sustainability, competitiveness and resilience of the European Union fisheries and aquaculture sector, <…> **PT** (2) The Union support shall also contribute to the activities as set out in the European Ocean	**IE** The definition of the term 'sustainable blue economy' as set out in COM(2025) 565 (NRPP Regulation) is very broad. In order to ensure the correct targeting of funding, a more focused definition would be very useful, and could align with the sectors identified by the EU Blue Economy Observatory **LT** Please explain whether and what egal basis for supporting activities as set out in European Ocean Pact. "Fisheries and aquaculture sector"- in this context it looks like fisheries activities do not include aquaculture activities. It's confusing, because in other regulation proposals some there its mention "fisheries and aquaculture" but some there just, for example, "sustainable

PUBLIC

Commission proposal	Drafting suggestions	Comments
	Pact and contribute to the Union's objective of the sustainability of our ocean, and climate neutrality target, the sustainability, competitiveness and resilience of the European Union fisheries, ~~and~~ aquaculture ~~sector, the sustainability, resilience and competitiveness of the European~~ **and** blue economy **sectors**, the resilience of coastal and island communities, as well as outermost regions **(due to their special characteristics and specific constraints as set out in Article 349 TFEU)**, and the enhancement of ocean governance and ocean observation~~, including through Copernicus, the Union's Earth Observation programme and its marine-related services~~.	fisheries" and it's not clear - does it includes aquaculture or not. **Example: NRP Fund art. 35 (11)** (a) **-** support for sustainable **fisheries** <…> energy transition of **fisheries and aquaculture** as well as actions improving safety; (d) - support to fishers or aquaculture producers for the **compensation to operators** of the fishery and aquaculture sector for their income foregone or additional costs <…> *Does it mean*, that support for sustainable aquaculture (**investments**, except in energy transition and in actions improving safety) not part of NRP art. 10 (2) (a) (ii) – ring fenced allocations for CFP ? **Note:** please make sure that in these cases when statements in other regulation proposals will be actual and for aquaculture – always use "fisheries and aquaculture".
(3) The National and Regional Partnership Fund should contribute to achieving the environmental, economic, social and employment objectives of the Common Fisheries Policy (CFP), as set out in Article 2 of Regulation (EU) No 1380/2013 of the European Parliament	**DE** (3) The National and Regional Partnership Fund **as well as other relevant funds in the MFF framework** should contribute to achieving the environmental, economic, social and employment objectives of the Common Fisheries Policy (CFP), as set out in Article 2 of Regulation (EU) No 1380/2013 of the European	**DE** See above. **IE** We note that measures currently supported under the EMFAF programme to support implemenation of the CFP are split between those listed in Article 35(11) of the NRP

PUBLIC

Commission proposal	Drafting suggestions	Comments
and of the Council[3]. Such support should ensure that fishing activities are sustainable in the long term and are managed in a way that is consistent with the objectives as set out in Article 2 of the CFP Regulation.	Parliament and of the Council[4]. Such support should ensure that fishing activities are sustainable in the long term and are managed in a way that is consistent with the objectives as set out in Article 2 of the CFP Regulation.	Regulation, the EU Facility and others are not specifically mentioned in either Article 35(11) or Annex XV. Commission Fiche 12 has clarified that the ring-fenced allocation for CFP implementation (€2BN) is ring-fenced to the measures under Article 35(11). We note that the provisions of Article 35(11) include broader environmental measures that extend beyond the footprint of fisheries and species that are commerically fished, and are not appropriate for inclusion in an article related to CFP implementation. A clearer distinction needs to be made between the conservation objectives set out in the CFP and those set out in broader EU environmental Regulations.. As Article 35(11) as currently drafted includes all measures related to marine conservation, protection and restoration as being CFP measures, this will mean a significant dilution of that ring-fenced funding, which will be required then to support broader measures unrelated to the objectives of the CFP.

[3] Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC (OJ L 354, 28.12.2013, p. 22, ELI: http://data.europa.eu/eli/reg/2013/1380/oj).

[4] Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC (OJ L 354, 28.12.2013, p. 22, ELI: http://data.europa.eu/eli/reg/2013/1380/oj).

PUBLIC

Commission proposal	Drafting suggestions	Comments
		While we note that the unallocated funding for NRP Plans may be used to provide additional funding for measures under Article 35(11) or for other CFP related measures which are not specified in the NRP Regulation, we are mindful that there will be many competing demands on the unallocated funding. **LT** According NRP Fund art.4 (28) - 'fishing' means any natural person engaging in commercial fishing activities, as recognised by the Member State concerned. Lithuania finds this definition limiting and controversial. Does it mean that part "Such support should ensure that **fishing activities** are sustainable in the long term and are managed in a way that is consistent with the objectives as set out in Article 2 of the CFP Regulation" actual just for **natural** persons? We suggest that definitions like 'fisher', 'fishing' and other for fisheries important definitions must be included in this regulation or given clear reference to the definitions as it stands in respective articles of CFP/EMFAF/Fisheries Control regulations. **PT**
	PT	

PUBLIC

Commission proposal	Drafting suggestions	Comments
	(3) The National and Regional Partnership Fund should contribute to achieving the environmental, economic, social and employment objectives of the Common Fisheries Policy (CFP), as set out in Article 2 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council. **Founded on the three pillars of the CFP (environmental, economic, and social sustainability), such** support should ensure that fishing **and aquaculture** activities are sustainable in the long term and are managed in a way that is consistent with the objectives as set out in Article 2 of the CFP Regulation.	- The amendment aims to clarify that the NRP contributes to achieving the objectives of the CFP by ensuring the balance of its three pillars. - Aquaculture should be expressly mentioned in this recital, given that aquaculture is one of the components of the CFP as set out in Article 2(1) of the EU Regulation (EU) No 1380/2013 of the European Parliament and of the Council.
(4) The initiatives set out under the European Ocean Pact need to be supported and promoted with investments and funding from private and public sources. An integrated approach to funding and ocean-relevant policies will cover a broad range of elements such as: the conservation of marine biological resources as one of the five EU exclusive competences, the conservation and restoration of marine biodiversity, the management of and innovation in fisheries and aquaculture activities aiming at the sustainability and resilience of these sectors, the activities on implementing the CFP, generational renewal, ocean knowledge and observation, maritime security, food security, developing and scaling-up a competitive and sustainable blue economy,		**BE** a broad range of possibly very subsidy-consuming initiatives are added: 'maritime security' , offshore and ocean energy, desalination, bio-tech, …. We understand the objectives should not all be realised within the ring-fenced budget for fisheries but under the NRP as a whole. It would be good to know which actions are allowed to be allocated under the ring-fenced budget and which not? Eg.maritime security, bio-economy, offshore energy, … If all these actions can profit from the ring-fenced budet, there will be none left for fisheries and aquaculture… **DE**

PUBLIC

Commission proposal	Drafting suggestions	Comments
including but not limited to offshore and ocean energy, biotech and desalination, safeguarding underwater and coastal cultural heritage, supporting other blue economy sectors and industries to become climate neutral, deploy smart and zero emission solutions, building on science and the Ocean Research and Innovation Strategy as well as support to maritime spatial planning and maritime regional cooperation at sea basin level as well as the sustainable, resilient territorial development of coastal communities, islands and outermost regions.	**IE** ~~(4) The initiatives set out under the European Ocean Pact need to be supported and promoted with investments and funding from private and public sources. An integrated approach to funding and ocean-relevant policies will cover a broad range of elements such as: the conservation of marine biological resources as one of the five EU exclusive competences, the conservation and restoration of marine biodiversity, the management of and innovation in fisheries and aquaculture activities aiming at the sustainability and resilience of these sectors, the activities on implementing the CFP, generational renewal, ocean knowledge and observation, maritime security, food security, developing and scaling-up a competitive and sustainable blue economy, including but not limited to offshore and ocean energy, biotech and desalination, safeguarding underwater and coastal cultural heritage, supporting other blue economy sectors and industries to become climate neutral, deploy smart and zero emission solutions, building on science and the Ocean~~	The recital mentions a number of intervention areas. However, no legally binding reference to those is indicated in this or any other draft Regulation. **IE** Not withstanding over-arching concerns about the inappropriate status afforded to the European Ocean Pact in the proposed Regulation, in terms of drafting there is no need for this paragraph as the later paragraph (7) makes the same provision in clearer and more succinct language. Moreover, there are no conditions in the regulation itself beyond those relevant to measures associated with the CFP – See comments in respect of Article 2 **LT** "An integrated approach to funding and ocean-relevant policies will cover a broad range of elements such as: <…> conservation of marine biological resources as one of the five EU exclusive competences, the conservation and restoration of marine biodiversity"- do we understand correctly, that minimum reserved allocation (ring fenced) to implement core parts of the common fisheries policy (CFP), includes also funding marine conservation and restoration?

PUBLIC

Commission proposal	Drafting suggestions	Comments
	~~Research and Innovation Strategy as well as support to maritime spatial planning and maritime regional cooperation at sea basin level as well as the sustainable, resilient territorial development of coastal communities, islands and outermost regions.~~ **FI** The initiatives set out under the European Ocean Pact ~~need to~~ **may** be supported and promoted with investments and funding from private and public sources. **SE** "An integrated approach to funding and ocean-relevant policies will cover a broad range of elements such as: the conservation of marine biological resources as one of the five EU exclusive competences, the conservation and restoration of marine biodiversity, **adaptation to a changing climate,** the management of and innovation in fisheries and aquaculture activities aiming at the sustainability and resilience of these sectors, the activities on implementing the CFP, generational renewal, ocean knowledge and observation, maritime security, food security, developing and scaling-up a competitive and sustainable blue economy, including but not limited to offshore and ocean	<…> the management of and innovation in fisheries and aquaculture activities aiming at the sustainability and resilience of these sectors" - do we understand correctly that these projects will be funded through the Competitiveness Fund including innovation, green gear, electrification, decarbonisation, modernising vessels, port electrification, green shipbuilding, blue technologies ? <…> generational renewal" – do we understand correct, that support to generational renewal in the fishery and aquaculture sector will be provided under the amount reserved for the Common Agricultural Policy and only in coordination/linkage with this policy?

PUBLIC

Commission proposal	Drafting suggestions	Comments
	energy, biotech and desalination, safeguarding underwater and coastal cultural heritage, supporting other blue economy sectors and industries to become climate neutral, deploy smart and zero emission solutions, building on science and the Ocean Research and Innovation Strategy as well as **support that strenghtens the ecosystem based approach,** support to maritime spatial planning (…)"	
(5) Small-scale coastal fishing is carried out by marine and inland fishing vessels of an overall length of less than 12 metres and not using towed fishing gear, and by fishers on foot, including shellfish gatherers. That sector represents nearly 75 % of all fishing vessels registered in the Union and nearly half of all employment in the fisheries sector and is an important part of the economic fabric of coastal areas. Operators from small-scale coastal fisheries are particularly dependent on healthy fish stocks for their main source of income. Therefore, the particular needs of small-scale coastal fishing, and the contribution to environmental, economic and social sustainability of fishing operations, as defined in the CFP Regulation 1380/2013 should be addressed in the National and Regional Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation].	**DE** (5) Small-scale coastal fishing is carried out by marine and inland fishing vessels of an overall length of less than 12 metres and not using towed fishing gear, and by fishers on foot, including shellfish gatherers, **and operators involved in family-owned, artisanal fishing.** That sector represents nearly 75 % of all fishing vessels registered in the Union and nearly half of all employment in the fisheries sector and is an important part of the economic fabric of coastal areas. Operators from small-scale coastal fisheries are particularly dependent on healthy fish stocks for their main source of income. Therefore, the particular needs of small-scale coastal fishing, and the contribution to environmental, economic and social sustainability of fishing operations, as defined in the CFP Regulation 1380/2013 should be addressed in the National and Regional	**DE** Germany welcomes in principle a special consideration of small-scale coastal fishing. However, the very narrow definition of small-scale coastal fishing in Article 4(26) of the NRP Regulation is viewed critically (vehicle length less than 12 m, without towing gear). The rigid distinction of eligibility on the basis of these characteristics does not seem adequate in practice. The transitions between small-scale coastal fishing and other fleet segments are often fluid. For structurally important sub-fleets, such as small-scale, family-run German brown shrimp fishing, this definition does not entail a determination on their eligibility for a higher support intensity, which may lead to uncertainty or disadvantage of these fishing segments. Provision should be made either for a definition which leaves room for consideration of regional

PUBLIC

Commission proposal	Drafting suggestions	Comments
	Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation]. **IE** (5) Small-scale coastal fishing is carried out by marine and inland fishing vessels of an overall length of less than 12 metres and not using towed fishing gear, and by fishers on foot, including shellfish gatherers. That sector represents nearly 75 % of all fishing vessels registered in the Union and nearly half of all employment in the fisheries sector and is an important part of the economic fabric of coastal areas. ~~Operators from small-scale coastal fisheries are particularly dependent on healthy fish stocks for their main source of income.~~ Therefore, the particular needs of small-scale coastal fishing, and the contribution to environmental, economic and social sustainability of fishing operations, as defined in the CFP Regulation 1380/2013 should be ~~addressed~~ assessed in the National and Regional Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation]. With the aim of supporting this sector, and sustainable fishing practices, where justified by this assessment Member States ~~should aim to~~ could aim to give operators from small-scale	circumstances or for the possibility of increased support rates for the sub-segments concerned. **IE** Suggest amending to include the next paragraph in the recital, see comments below also

PUBLIC

Commission proposal	Drafting suggestions	Comments
	coastal fisheries preferential treatment when implementing measures, for example through enhanced aid intensity rates **ES** ~~(5) Small-scale coastal fishing is carried out by marine and inland fishing vessels of an overall length of less than 12 metres and not using towed fishing gear, and by fishers on foot, including shellfish gatherers. That sector represents nearly 75 % of all fishing vessels registered in the Union and nearly half of all employment in the fisheries sector and is an important part of the economic fabric of coastal areas. Operators from small-scale coastal fisheries are particularly dependent on healthy fish stocks for their main source of income. Therefore, the particular needs of small-scale coastal fishing, and the contribution to environmental, economic and social sustainability of fishing operations, as defined in the CFP Regulation 1380/2013 should be addressed in the National and Regional Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation].~~ **PT** (5) Small-scale coastal fishing is carried out by marine and inland fishing vessels of an overall	**ES** References to definitions included in [Regulation (EU) [NRP Fund] are premature. **LT** 'According NRP Fund art.4 (28) - 'fishing' means any natural person engaging in commercial fishing. "Therefore, the particular needs of small-scale coastal fishing, <…> should be addressed in the National and Regional Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation]" – due to controversial spirit of the definition (and translation to Lithuanian) of "fishing" it seems that legal person (or business entity/company) engaging in small-scale coastal fishing is not eligible for support? **PT** Small-scale fishing is very important for the economic and social balance of coastal

PUBLIC

Commission proposal	Drafting suggestions	Comments
	length of less than 12 metres and not using towed fishing gear, and by fishers on foot, including shellfish gatherers. That sector represents nearly 75 % of all fishing vessels registered in the Union and nearly half of all employment in the fisheries sector and is an important part of the economic fabric of coastal areas **and local communities**. Operators from small-scale coastal fisheries are particularly dependent on healthy fish stocks for their main source of income. Therefore, the particular needs of small-scale coastal fishing, and the contribution to environmental, economic and social sustainability of fishing operations, as defined in the CFP Regulation 1380/2013**, as well as their contribution for the cohesion of coastal communities, employment and food security,** should be addressed in the National and Regional Partnership (NRP) Plans, as set out in Article 22 of [NRP Regulation].	communities, because it creates jobs in fisheries and also in other associated ativities such as gastronomy, restaurants, artcraft and tourism in general.
(6) With the aim of encouraging sustainable fishing practice, the Member States should aim to give operators from small-scale coastal fisheries preferential treatment, through a maximum 100 % aid intensity rate.	**BE** ~~(6) With the aim of encouraging sustainable fishing practice, the Member States should aim to give operators from small-scale coastal fisheries preferential treatment, through a maximum 100 % aid intensity rate.~~	**BE** The representation of small-scale coastal fishing (SSCF) varies significantly across Member States. In Belgium, it is much lower than 75%. In our view, SSCF does not require special treatment, as other fleet segments may be more sustainable or efficient depending on the specific context.

PUBLIC

Commission proposal	Drafting suggestions	Comments
		BG The support intensity of 100% only for small-scale coastal fishing, while the support intensity for other measures is left to the discretion of the member states, raises concerns about ensuring equal levels of support and maintaining competitiveness among the Member states in the EU. This legal uncertainty is a prerequisite for prolonged negotiations during the approval of national plans, where member states have limited capacity. This circumstance is also a prerequisite for inequality between Member States in the implementation of political goals.
	DE (6) With the aim of encouraging sustainable fishing practice, the Member States should aim to give operators from small-scale coastal fisheries **or operators involved in family-owned, artisanal fishing** preferential treatment, through a maximum 100 % aid intensity rate.	**DE** See above.
	IE ~~(6) With the aim of encouraging sustainable fishing practice, the Member States should aim to give operators from small-scale coastal fisheries preferential treatment, through a maximum 100 % aid intensity rate.~~	**IE** There are no grant intensity rates stipulated in the NRP Regulation, so it appears Member States will have the flexibility to determine these rates. If this is the correct understanding, then there is no need to stipulate this here, and the

PUBLIC

Commission proposal	Drafting suggestions	Comments
		possibility for preferential treatment for SSCF is better reflected in the paragraph on SSCF above
	CY (6a) Recognising the importance of generational renewal, Union support should contribute to making the fisheries and aquaculture sectors more attractive to younger generations, ensuring their long-term sustainability and safeguaring socieconimic activities in coastal areas and cultural herittage. (6b) Lifelong learning, vocational training, and skills development are essential to enhance the competitiveness and resilience of the fisheries sector and to equip workers with the knowledge and abilities required in their profession but also diversifying their activities in other blue economy areas. (6c) Union support should also promote investments improving working conditions, health and safety on board fishing vessels, and the overall quality of employment in the sector, thereby contributing to having modern, secure, vessels that would provide for decent livelihoods for fishers.	**CY** There is a need for the recitals to include an explicit reference to generational renewal and improving the attractiveness of the fisheries sector. This should underline the importance of lifelong learning, vocational training, and skills development to ensure the sector remains competitive and appealing to younger generations. The recitals should also acknowledge that achieving these EU broader objectives on skills, safety, and decent work requires targeted support for fleet investments aimed at improving working conditions, health and safety on board, and overall quality of employment in the sector.
	PT	**PT**

Commission proposal	Drafting suggestions	Comments
	(6) With the aim of encouraging sustainable fishing practices, the Member States should aim to give operators from small-scale coastal fisheries preferential treatment, through a maximum 100 % aid intensity rate. **FI** With the aim of encouraging sustainable fishing practice, the Member States ~~should aim to~~ **may** give operators from small-scale coastal fisheries preferential treatment, through a maximum 100 % aid intensity rate.	The small-scale fishing is an important tool to improve the sustainable management and ensure better conservation and restoration of marine biodiversity. COM must clarify if 100% aid intensity rate comes exclusively from the NRP Fund? **FI** The same wording should be used as in the article 3. It should be noted that max. 100 % intensity rate is not relevant and should not be engouraged for all SSCF projects, for example private investments. **SE** Sweden acknowledges the importance of preferential treatment for small-scale fishing operations, but believes that maintaining a certain level of co-financing for most interventions carries important aspects, including in terms of effectiveness and environmental responsibility. How has the Commission considered the risks associated with granting 100 % aid intensity to enterprises, particularly regarding dead weight effects and environmental impact?
(7) Member States should take into account in their NRP Plan the activities set out in the European Ocean Pact for the conservation and	**DE** (7) Member States ~~should~~ **take** into account in their NRP Plan the activities set out in the	**IE** See comment above related to Recital 4

PUBLIC

Commission proposal	Drafting suggestions	Comments
restoration of marine biological resources, the restoration of marine biodiversity, the management of and innovation in sustainable fisheries and aquaculture activities, building on innovative solutions produced by research and science, maritime security, the development of a competitive and sustainable blue economy, protecting and empowering coastal communities and islands and the promotion of maritime regional cooperation at sea basin level.	European Ocean Pact for the conservation and restoration of marine biological resources, the restoration of marine biodiversity, the management of and innovation in sustainable fisheries and aquaculture activities, building on innovative solutions produced by research and science, maritime security, the development of a competitive and sustainable blue economy, protecting and empowering coastal communities and islands and the promotion of maritime regional cooperation at sea basin level. **PT** (7) Member States should take into account in their NRP Plan the activities set out in the European Ocean Pact for the conservation and restoration of marine biological resources, the restoration of marine biodiversity, the management of and innovation in sustainable fisheries and aquaculture activities, building on innovative solutions produced by research and science, maritime security, the development of a competitive and sustainable blue economy, protecting and empowering coastal communities**,** ~~and~~ islands **and outermost regions,** and ~~the promotion of~~ **promoting** maritime regional cooperation at sea basin level. **FI**	**PT** Outermost regions must be included due to their special characteristics and specific constraints as set out in Article 349 TFEU. **FI**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	Delete.	This resital gives explapanation to NRP-articles and not CFP.
(8) It should be possible to support actions related to fisheries, aquaculture and blue economy that contribute to the achievement of the environmental and climate change mitigation and adaptation objectives of the Union, including the energy transition for all sectors.	**IE** (8) It should be possible under the NRP, including the Social Climate Fund, to support actions related to fisheries, aquaculture and blue economy that contribute to the achievement of the environmental and climate change mitigation and adaptation objectives of the Union, including the energy transition for all sectors.	**IE** The need to alleviate the social and economic impacts of ETS2 applies equally in the fisheries and aquaculture sector in respect of micro-enterprises in the sector. **NL** The NRPP regulation has a definition of "sustainable blue economy", but not of "blue economy". Is there a difference, or should the term "sustainable blue economy" be more appropriate?
(9) The Common Market Organisation (CMO) for fishery and aquaculture products, as established by Regulation (EU) No 1379/2013, is a key pillar of the Common Fisheries Policy and plays a vital role in ensuring the stability and transparency of EU fishery and aquaculture markets. To this end, Member States shall take into account in their NRP Plan support, notably for the establishment and strengthening of Producer Organisations, the implementation and enforcement of marketing standards, the collection and dissemination of market data at the national level.		**BE** In the NRP regulation support for production and marketing plan has disappeared. How will this be financed? **DE** This recital does not consider significant parts of current support, such as processing and marketing (e.g. generation of added value and optimization of value chains). **IE** The provisions in EMFAF covering support for the CMO are set out in Article 26 of the EMFAF Regulation, which also includes a mechanism

PUBLIC

Commission proposal	Drafting suggestions	Comments
		for addressing significant disruption to markets. The provisions of the NRP Regulation 35(11)(d) refer to compensation for income foregone and additional costs incurred but are unclear as to the circumstances in which any such compensation would be payable. While the Unity Safety Net (Recital 41 and Article 32 NRP Regulation) addresses agricultural markets, either its provisions should be extended to include seafood markets, or supports in respect of market stabilisation should be included here and in the articles in this Regulation
	PT (9) The Common Market Organisation (CMO) for fishery and aquaculture products, as established by Regulation (EU) No 1379/2013, is a key pillar of the Common Fisheries Policy and plays a vital role in ensuring the stability and transparency of EU fishery and aquaculture markets. To this end, Member States shall take into account in their NRP Plan support, notably for the establishment and strengthening of Producer Organisations, the implementation **of production and marketing plans** and enforcement of marketing standards, **as well as** ~~the collection,~~ **the promotion of new markets and the development of collection** and dissemination of market data ~~at the national level~~.	**PT** The NRP should be able to support the marketing of fishery and aquaculture products in accordance with the objectives set out in Regulation (EU) No 1379/2013 of the European Parliament and of the Council.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	FI Delete	**FI** This also refers to NRP regulation and would be more logical to bring up in the NRP-recitals.
(10) The Common Fisheries Policy is based on science-based decision making and the fulfilment of adequate controls and no tolerance for illegal, unreported and unregulated fishing. Member States should be supported to implement EU corresponding legislation and ensure activities in these areas are planned.		**BE** It remains unclear how data collection and control should be funded under the new MFF. **BG** The proposal for the regulation lacks information on how control and data collection support will be applied. More detailed information is needed regarding their financing through the EU Facility. Moreover, it would be impossible for Bulgaria to ensure adequate control and data collection without the funding provided by the Fund. **DE** GER asks the Commission to explain from which budget approach fisheries control will be financed in the future. Article 10(2)(a)(ii) in conjunction with Article 35(11) of the NRP Regulation imply that fisheries control and data collection are not one of the core tasks to be financed from the minimum amount for CAP-CFP **EE** This recital and the EU actions in the Annex of NRP Regulation seems to refer to the possibility

PUBLIC

Commission proposal	Drafting suggestions	Comments
		to support fisheries data collection and control activities from the EUFacility. However the replies given by the COM indicate that the financing for data collection and control will be implemented only under direct management. This needs to be clarified.
	IE (Drafting Suggestions): (10) The Common Fisheries Policy is based on science-based decision making and the ~~fulfilment~~ implementation of adequate fisheries data collection measures and fisheries control~~s~~ and enforcement measures, ~~and~~ with no tolerance for illegal, unreported and unregulated fishing. Recognising that the majority of these measures are undertaken in shared waters, to the benefit of all Member States, the implementation of such measures by Member States should be supported under the EU Facility. ~~to implement EU corresponding legislation and ensure activities in these areas are planned~~.	**IE** Data collection and control and enforcement measures are implemented to support the management of a shared resource to the benefit of the union. Provision for these measures in Annex XV to the NRP Regulation, which is funded under the EU Facility, should extend to all such activities whether under the authority of the Commission or implemented at Member State level to achieve compliance with MS legal obligations. Alternatively, given their importance to the effective implementation of the CFP and their mandatory nature, these could be provided for under Article 35(11), with the ring-fenced allocation increased accordingly.
	PT (10) The Common Fisheries Policy is based on science-based decision making **and on long-term environmental, economic, and social sustainability, including Data Collection, as**	**PT** The Data Collection Programme and the EU Fisheries Control System, established in the CFP, must be supported accordingly by this

PUBLIC

Commission proposal	Drafting suggestions	Comments
	well as on ~~and~~ the fulfilment of adequate controls and no tolerance for illegal, unreported and unregulated fishing in the framework of EU Fisheries Control System ~~Member States should be supported to implement EU corresponding legislation and ensure activities in these areas are planned~~.	Fund, considering that they are crucial for the implementation of compulsory measures by MS. **FI** What is the reasonin behind this recital?
HAVE ADOPTED THIS REGULATION:		
Article 1		
Subject matter	**PT** ***Scope***	
1. This Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], and in particular point (d) thereof. The Union support shall contribute to the activities as set out in the European Ocean Pact and to the implementation of the Common Fisheries Policy.	**DE** 1. This Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], and in particular point (d) thereof. The Union support shall contribute ~~to the activities as set out in the European Ocean Pact and~~ to the implementation of the Common Fisheries Policy **and the Union's maritime and aquaculture policy. It may contribute to the activities as set out in the European Ocean Pact.**	**DE** The term 'Common Fisheries Policy' is used inconsistently in the Regulation framework: Article 35(11) of the NIP Regulation lists interventions which are "included" in the CFP. However, this list indicated interventions not covered by the CFP Regulation framework (such as the protection and restoration of aquatic ecosystems); at the same time, core CFP measures are not listed (e.g. fisheries control). This leads to uncertainty as to what exactly is meant by 'implementation of the CFP' in the regulation framework. In particular, it raises the question whether (inland) aquaculture and pond management as well as the promotion of CLLD, unlike in the past, will be supported within other thematic funding areas in the future (agricultural support or LEADER). However, the

PUBLIC

Commission proposal	Drafting suggestions	Comments
		corresponding draft regulations relating to these funding areas (GAP, LEADER) as well as the NRP-Regulation do not make reference to (inland) aquaculture and FLAG. This creates a state of legal uncertainty regarding the consideration of (inland) aquaculture, pond management and FLAG funding within the regulation framework. It should be ensured that the CFP-Regulation also covers or addresses support for investments in inland fisheries and aquaculture (including processing and marketing measures) and research projects in these areas. See above for the Ocean Pact. **EE** It seems that the CFP and Ocean Pact are not on equal level as also highlihted by the CLS. It also seems appropriate to concentate in this proposal to the CFP specific rules and general topics such as Maritime Policy and Ocean Pact should be reflected in the NRP proposal.
	LT This Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], and in particular point (d) thereof. ~~The~~	**LT** Excessive requirement. It is stated that this Regulation lays down the specific conditions for support provided in accordance with the general objective "to support the implementation of the common fisheries policy of the Union", it's not

PUBLIC

Commission proposal	Drafting suggestions	Comments
	~~Union support shall contribute to the activities as set out in the European Ocean Pact and to the implementation of the Common Fisheries Policy~~. Or This Regulation lays down specific conditions **for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy** in accordance with the general objectives laid down in Article 2 **(d)** of Regulation XX [NRP Fund]~~, and in particular point (d) thereof. The Union support shall contribute to the activities as set out in the European Ocean Pact and to the implementation of the Common Fisheries Policy.~~ **PT** 1. This Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], and in particular point (d) thereof. The Union support shall contribute **to the implementation of the Common Fisheries Policy and to** the activities as set out in the	necessary to repeat it. But requirement, that each type of action shall contribute to the activities as set out in the European Ocean Pact is excessive. Please take into the consideration the comment concerning legal background for financing Ocean Pact. **NL** NL shares the concern of the CLS that referring to the Ocean Pact in a regulation, makes it seem that the Ocean Pact, which is a Commission Communication, has legal status. This comment applies to the title of the regulation as well. **PT** Text reordered to keep conformity througout the entire document. **SI** Slovenia agrees with other comments that this Article should define what is, in fact, the subject matter of this Regulation, such as "laying down specific conditions for the implementation of the Union support to the Common Fisheries Policy,

PUBLIC

Commission proposal	Drafting suggestions	Comments
	European Ocean Pact ~~and to the implementation of the Common Fisheries Policy~~. **FI** This Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], and in particular point (d) thereof. ~~The Union support shall contribute to the activities as set out in the European Ocean Pact and to the implementation of the Common Fisheries Policy.~~	to the European Ocean Pact and of the Union's maritime and aquaculture policy". **FI** We suggest removing the final sentence: "The Union support shall contribute to the activities as set out in the European Ocean Pact and to the implementation of the Common Fisheries Policy." This sentence may create ambiguity, especially in light of Article 22(2)(c) of the NRP Regulation, which provides a derogation from the requirement to set milestones and targets for CFP-related measures. According to this provision, CFP measures are to be planned and implemented based on output indicators, similar to CAP-related measures. However, the Ocean Pact encompasses a broad range of maritime activities that go beyond the scope of the CFP. Applying the same derogation to Ocean Pact-related measures may not be appropriate, as these activities are more diverse and economically oriented. Planning and implementation based on milestones and targets, rather than solely on output indicators, would likely be more suitable for such measures. Therefore, it would be clearer and more coherent to limit the scope of this Regulation strictly to

PUBLIC

Commission proposal	Drafting suggestions	Comments
		CFP-related measures. Including Ocean Pact and broader maritime activities under the same framework may lead to confusion in the interpretation and implementation of national NRP plans.
This Union support shall be provided under the National and Regional Partnership Fund, including the EU Facility in accordance with the rules governing that Fund and set out in Regulation (EU) […] [National and Regional Partnership Fund].	**DE** This Union support shall be provided under the National and Regional Partnership Fund, including the EU Facility in accordance with the rules governing that Fund and set out in Regulation (EU) [...] [National and Regional Partnership Fund] **as well as other relevant funds in the MFF framework and the rules governing those funds.**.	**DE** See above. **IE** See comments at Recital 10. **CY** EU facility should provide for a national envelope under shared management for data collection and control for the activities that are essential for safeguarding the provisions of data collection framework program and the implementation of IT infrastructure, FMC development and specific control and inspection programs as well as participation in training and other fora that pertain to the development, implemetation and review of scientific work in stock assessment and management and fisheries control. On the last point the Commission can refer to the two previous programming periods to assess the improvement and benefits in participation in such fora as it was directly linked with the provision for this actions under shared

PUBLIC

Commission proposal	Drafting suggestions	Comments
		management in EMFF and EMAF as compared to EFF. **PL** PL advocates maintaining a separate fisheries fund or at least ensuring that the provisions governing support for the fisheries sector are clearly separated within the regulation establishing the NRP Fund [COM(2025)565]. PL notes the ambiguity of the provisions of this regulation, in which the scope of financial support for the CFP is defined in Title V (Article 35(11)) entitled Common Agricultural Policy (CAP). The CFP is not part of the CAP. In PL's opinion, the lack of a clear distinction between these two policies in legislative proposals may create the misleading impression that aid designed on the basis of Article 35(11) will be addressed exclusively to fisher-farmers. This situation leads to a lack of clarity as to whether every reference to the CAP in the Regulation should be understood to include support for the fisheries sector. A similar lack of clarity applies to Article 76 of the NRP Fund Regulation (Community-led local development), which in paragraph 1(1) refers to support for rural and coastal areas. Given the laconic nature of the Regulation [COM(2025)559], it is unclear whether the scope of support will sufficiently

PUBLIC

Commission proposal	Drafting suggestions	Comments
		cover fisheries and aquaculture areas (local fishing communities). In view of the above, PL reiterates that it is impossible to analyse the provisions of the regulation in question in isolation from the provisions of other legislative proposals developed as part of the Multiannual Financial Framework 2028-2034, and therefore PL's position on the regulation in question may change depending on the progress of work, in particular on the NRP Fund regulation.
	PT 2.	**PT** - Which measures and actions from CFP could be included in the UE Facility? - Which relation between this paragraph and the text of Annex XV paragraph1 - e)? - The Data Collection Programme and the EU Fisheries Control System are included in Annex XV? This means that they will go out of shared management? **FI** How can the EU Facility be used in funding fisheries control and data collection in practise at MS level? **SE**

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Could the Commission please clarify how funding from the EU facility will be implemented in relation to the Common Fisheries Policy (CFP), particularly regarding data collection and fisheries control? We would appreciate further elaboration on how these measures will be financed under the facility, as the practical implication of the proposed setup is still unclear to us.

PUBLIC

Commission proposal	Drafting suggestions	Comments
Article 2	**DE** ~~*Article 2*~~ **FI** Delete art. 2.	**DE** Redundant as it constitutes a repetition of Article 1 / Article 3. **FI** Support for the Council Leag Service comment on WP 2/10, this article could be deleted. There is an overlap with art. 1.
Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy	**DE** ~~***Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy***~~ **PT** ***Subject matter*** **FI** Delete.	**BG** Article 2 and Article 3 have same titles. **IE** We suggest including a specific subsection under the Article on CFP to reference alignment of support for aquaculture with the CFP – as currently stated in the EMFAF Regulation (Article 27) ***'support shall be consistent with the multiannual national strategic plans for the development of aquaculture referred to in Article 34(2) of Regulation (EU) No 1380/2013.'***
1. Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy shall support the general objectives set out in Article 2 (d) of [the NRP regulation].	**DE** ~~1. Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy shall support the general objectives set out in Article 2(d) of [the NRP regulation].~~	**CZ** CZ welcomes the level of flexibility in determining the scope and areas of support in the proposal. In order to maintain competitive and sustainable aquaculture, it is particularly important to maintain support for innovation and productive investment, which are very technologically and

PUBLIC

Commission proposal	Drafting suggestions	Comments
		financially demanding, but at the same time are the driving force behind the sector. **EE** This seems to be unneccesary duplication of Article 1 and the title of Article 3.
	IE 1. Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy shall support the general objectives set out in Article 2 (1) (d) of [the NRP regulation] **CY** Union support to the Common Fisheries Policy, the European Ocean Pact and the Union's maritime and aquaculture policy shall contribute to the general objectives set out in Article XXX of [the NRP Regulation] and to the specific objectives established in this Regulation. 1.Support under this Regulation shall be drawn from: a) the ring-fenced envelope provided for the CFP under article XX of the NRP regulation, for which the measures and areas of intervention relate to investments in the fisheries and	**IE** We welcome the clarity of focus provided by this Article. It confirms that while measures may be relevant to the Ocean Pact, maritime policy etc the clear intent is that all such measures ultimately support the objectives of the CFP.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	aquaculture sectors including environmntal and natura 2000 site actions directly related to the fisheries and aquaculture sectors; these may include: i) permanent and temporary cessation, ii) investments on board fishing vessels iii) compensations for …….. iv) aquaculture investments for productive investments and investments in modenrazation or creation of new entrprizes, v) marketing of fisheries products vi) ……. vii) …… b) the non-ring-fenced national envelope, provided for under article XX of the NRP regulation for which the measures and areas of intervention related to fishing port and fishing shelter infrastructure, maritime sector and the european ocean pact ; c) the EU Facility, provided for under article XX of the NRP regulation for which the measures and areas of intervention relate to fisheries control and data collection as well as crisis…;	

PUBLIC

Commission proposal	Drafting suggestions	Comments
	d) the Competitiveness Fund, for which the measures and areas of intervention relate to …; e) the Social Fund, provided for under article XX of the NRP regulation for which the measures and areas of intervention relate to professional and vocational training, learnig new skills …; f) the …… provided for under article XX of the NRP regulation, for which the measures and areas of intervention relate to … 2. the measure and areas of intervention defined under point 1 a,c,d,e can be further supported through the non ringefenced envelop under point 1b.] **LT** 1. ~~Support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy shall support the~~ general objectives set out in Article 2 (d) of [the NRP regulation].	**LT** What is the aim of this article? Is it possible, that this Regulation lays down specific conditions for the implementation of the Union support in accordance with the general objectives laid down in Article 2 of Regulation XX [NRP Fund], **but other than in Article 2 (d)** and which not contribute to the Common Fisheries Policy, to the European Ocean Pact or to the

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Union's maritime and aquaculture policy? If not – then we suggest deleting it.
	HU *(We propose to merge it with Article 1.)*	**HU** This article practically repeats Article 1.
		AT There is no reference to Article 3 of the [NRP Regulation] (specific objectives of the Fund) — why? From our point of view, this would be appropriate. • Suggestion: A reference to Article 3(1)(d)(ii) and, in particular, to (iv) should be added.
	PL 2. The maximum rate of co-financing from the NRP Fund for a given objective referred to in Article 2(1d) of the NRP Fund Regulation is XX % of eligible public expenditure.	**PL** In Poland's opinion, the current wording of Article 2 repeats the content of Article 1, sentence 1. Taking into account the regulation as a whole, we note that it lacks budgetary information on the amount of funds allocated to the implementation of the common fisheries policy, the EU's maritime policy and aquaculture. Information on national envelopes is included in the EC services' working document (WK 11809/2025 INIT). In PL's opinion, such information should be strictly regulated by the provisions of the regulation.

PUBLIC

Commission proposal	Drafting suggestions	Comments
		The regulation should also contain information on the amount of EU co-financing for all measures, or at least for measures covered by ring-fencing. **Poland notes a very worrying trend of regulating important implementation issues in non-legislative documents (drafted outside the legislative procedure).** The proposed guaranteed amount (EUR 2 billion) is a drastic reduction compared to previous EU financial perspectives, under which the fisheries sector had access to its own fund and a separate financial envelope reserved for it – in the case of the EMFAF, this amounted to EUR 5.3 billion, and in the case of the EMFF EUR 5.7 billion. PL understands that funds for the fisheries sector may come from other, non-fisheries MFF budget lines, which is intended to increase the flexibility and decision-making power of Member States – which want to allocate funds under the national NRP Plan. However, the complete lack of information, both in the NRP Fund Regulation and in the Regulation under discussion, on the amount of funds and the rules for their allocation to the fisheries sector will result in a de facto drastic reduction in the

PUBLIC

Commission proposal	Drafting suggestions	Comments
		budget for the fisheries sector, as its size will depend on other important needs defined in the NRP Plan. This is all the more incomprehensible given that the activities of the Baltic fisheries sector are subject to full EU regulation and, given the current state of resources, require continued support.. **PT** The text of this article is similar to the text in the number 1 of article 1.
	PT ~~1.~~ **FI** Delete.	

PUBLIC

Commission proposal	Drafting suggestions	Comments
Article 3		
Support for the Common Fisheries Policy, the European Ocean Pact and the Union's maritime and aquaculture policy	**DE** ***Support for the Common Fisheries Policy~~, the European Ocean Pact~~ and the Union's maritime and aquaculture policy*** **PT** ***Financing requirements*** **FI** **Support for the Common Fisheries Policy~~, the European Ocean Pact~~ and the Union's maritime and aquaculture policy**	**DE** See above. **AT** The heading of Article 3 is identical to that of Article 2. **PT** Title of the article must be changed.
		PL In Poland's opinion, the draft regulation lacks clarification of the permissible, EC-acceptable areas of intervention and minimum eligibility rules at EU level. This is worrying given the obligation imposed on Member States to take into account the recommendations made by the EC in the proposed support. In PL's opinion, such an obligation may result in a restriction of the Member State's freedom to

PUBLIC

Commission proposal	Drafting suggestions	Comments
		shape future interventions, which is contrary to flexibility. With regard to the fisheries sector, for which no separate conditionality has been specified in the draft regulation, this situation may result in a disruption of the uniform approach at EU level and an individualised assessment of the rules of support for individual Member States – e.g. with regard to the possibility of implementing compensation measures that are key for Baltic fisheries.
1. Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture and coastal communities and in particular of small-scale coastal fishing in line with Article 22 (2)(i) of [the NRP regulation].	**BE** Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture and coastal communities ~~and in particular of small-scale coastal fishing~~ in line with Article 22 (2)(i) of [the NRP regulation]. **DE** 1. Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture, **inland fisheries, pond farming** and coastal communities and in particular of small-scale coastal fishing in line with Article 22 (2)~~(i)~~ **(g) (iii)** of [the NRP regulation]. **2. The support may be provided in particular for the following types of activities:**	**BE** We do not understand the rationale for mentioning small-scale coastal fishing separately. **DE** The differentiated designation of the different areas of support, including inland fishing and (internal) aquaculture/pond farming, is a prerequisite for addressing the specific needs in a targeted manner (see also the Federal Republic of Germany's opinion on EU marine, fisheries and aquaculture funding after 2027). It is proposed to define types of intervention for each area of the CFP and to provide a concrete legal basis for the support to these interventions.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	(a) activities strengthening economically, socially and environmentally sustainable fishing and aquaculture; **(b) activities contributing to the development of competitive and sustainable and resilient small-scale coastal fishing;** **(c) activities increasing energy efficiency and reducing CO_2 emissions and decarbonisation efforts aiming at carbon neutrality, including the energy transition;** **(d) activities, including financial instruments, aiming to support the sector in its modernisation effort of the fishing fleet and/or improving safety onboard, without contributing to overfishing and overcapacity;** **(e) activities promoting generational renewal and gender balance in the fisheries and aquaculture sectors;** **(f) activities promoting the adjustment of fishing capacity to fishing opportunities, restructuring strategies leading to sustainable business models and contributing to a fair standard of living** **(g) activities fostering efficient fisheries control and enforcement, including fighting against IUU fishing, as well as**	**EE** It seems that reference to NRP provision is not correct. **CY** The enumeration of article 22.2 of the NRP regulation is wrong and will need to be corrected, and accordingly reflected here.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	collection of scientific data for knowledge-based decision making; **(h) activities promoting a level-playing field for fishery and aquaculture products from the outermost regions, specifically through the compensation of additional costs for fishing, farming, processing and marketing of fishery and aquaculture products;** **(i) activities contributing to the conservation, protection and restoration of aquatic biodiversity and ecosystems, including promoting cooperation between organised groups (e.g. fishers, scientists, civil society organisations, local, regional and national authorities) for the designation and/or the sustainable management of Marine Protected Areas;** **(j) sustainable aquaculture activities especially strengthening the competitiveness of aquaculture production, while ensuring that the activities are environmentally sustainable in the long term;** **(k) activities promoting marketing, quality and added value of fishery and aquaculture products, as well as processing of those products;**	

PUBLIC

Commission proposal	Drafting suggestions	Comments
	(l) activities contributing to enabling a sustainable blue economy in coastal, island and inland areas, and to fostering the sustainable development of fishing and aquaculture communities; **(m) activities strengthening sustainable sea and ocean management through the promotion of marine knowledge, maritime surveillance or coast guard cooperation, maritime regional cooperation at sea basin level and maritime spatial planning;** **(n) activities contributing to the climate adaptation and resilience of coastal communities and Local Fisheries Action Groups (FLAG) including through the implementation of community-led local development (CLLD) activities;** (o) **Activities to support the fisheries and aquaculture sector in case of crisis and market disruptions.** **IE** 1. Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture and coastal communities and in particular of small-scale coastal fishing in line with Article 22 (2)(g)~~(i)~~ of [the NRP regulation].	**LT**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	LT Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture **activities** and coastal communities and in particular of small-scale coastal fishing in line with Article 22 (2**) (g) (iii)** ~~(i)~~ of [the NRP regulation]. **HU** 1. Member States shall take into account in their NRP Plan the specific needs of fisheries, aquaculture and coastal communities and in particular of small-scale coastal fishing in line with Article 22 (2)**(g)** of [the NRP regulation].	Do we understand correctly that - coastal communities (fisheries CLLD's) will be supported through the amount of €453 billion available for economic, territorial and social cohesion (Heading 1 not ring-fenced part)? **HU** Article 22(2)(g), in particular, its subpoint (iii) seems more relevant here. The referenced Article 22 (2)(i) refers to promotion of partnership, knowledge exchange and distribution of agricultural products. While its subpoint (i) on stakeholder consultations might also be interpreted as applying to fisheries, the subpoints (ii) and (iii) clearly refer to the CAP regulation and the (agricultural) CFP regulation, which do not apply to fisheries. **AT** The reference to Article 22(2)(i) of the [NRP Regulation] is incorrect and should be deleted; a reference to points (c) and (g)(iii) should be inserted instead. **PL**

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Identification/clarification/standardisation of an area indicator (e.g. high unemployment rate) for fishing, aquaculture and coastal communities, in particular small-scale coastal fisheries. **PT** The reference to Article 22(2) (i) must be corrected. **SI** Slovenia supports the particular attention given in this article to small-scale coastal fishing. However, we would also highlight that this should not turn into an administrative burden e.g. demanding particular chapters or documents that would be dedicated exclusively to small-scale coastal fishing. This is because, in some Member States such as Slovenia, small-scale coastal fishing represents the majority of the fishing fleet and the activities related to the financing of implementation of the Common Fisheries Policy will be mostly used for small-scale coastal fishing fleets. **SE** We would like to ask about the reasoning behind the selection of the measures included in the earmarking for fisheries in article 35.11 in the

PUBLIC

Commission proposal	Drafting suggestions	Comments
		proposed NRP-regulation? What objectives guided the choice of these particular measures? Article 22 (b) in the proposed NRP-regulation states that the NRPP should effectively address all or a significant share of the challenges identified in the country-specific recommendations. This also applies to "other relevant documents" issued by the Commission related to the objectives laid down in Article 3. Can the Commission clarify what is meant by "in other relevant documents" and the scope of these relevant documents related to the objectives in article 3 (d) (iv)?
2. Member States shall take into account in their NRP Plan the contribution to environmental, economic and social sustainability of fishing operations and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member States in accordance with Article 22(2) of Regulation (EU) No 1380/2013.	**BE** Member States shall take into account in their NRP Plan the contribution to environmental, economic and social sustainability of fishing operations ~~and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member States~~ in accordance with Article 22(2) of Regulation (EU) No 1380/2013. **IE** 2. Member States shall take into account in their NRP Plan the objectives of the Common Fisheries Policy and the contribution of their NRP to environmental, economic and social	**BE** The current fishing capacity ceilings complicate the transition to energy-efficient and safe vessels that offer good working conditions on board, which are essential to attract new generations to the sector. **BG** The wording for "the balance between fishing capacity of the fleets and available fishing opportunities" is too general and does not carry practical value. It is necessary to clarify how exactly this balance will be accounted for and reflected in the plans, and how it will be

PUBLIC

Commission proposal	Drafting suggestions	Comments
	sustainability of fishing operations and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member States in accordance with Article 22(2) of Regulation (EU) No 1380/2013.	compared with the annual reports under Article 22 of Regulation (EU) No 1380/2013. It is necessary to provide real support for the modernization and optimization of fishing by applying a significantly more flexible approach to eligibility requirements, which is not based on ballanced segments and fishing activity. **DE** GER asks for further clarification of the term "shall take into account" and request the Commission to indicate possible interventions that are expected from MS in this context. **EE** What is meant by "the contribution of fishing operations to environmental, economic and social sustainability"? **HR** Article 3(2) refers to "contribution to the environmental, economic and social sustainability of fishing operations". We would appreciate clarification from the Commission on what this means.
	CY 2b. By 2026, the Commission shall, in close cooperation with Member States, prepare	**CY**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	guidelines to support the preparation and implementation of the measures referred to in paragraph 2. These guidelines shall provide a common framework for assessing the environmental, economic and social sustainability of fishing operations. 2c) member states shall also take into account their multiannual National strategic Aquaculture plans when preparing their NRP plan. **HU** 2. Member States shall take into account in their NRP Plan the contribution to environmental, economic and social sustainability of fishing **<u>and aquaculture</u>** operations and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member	Guidelines to be provided by the EC in 2026 should be included to be taken into acount in preparation of the NRP **LT** Does it mean that contribution for these measures are mandatory? Please indicate the non-exhaustive list of the measures foreseen in this regard. Do we understand correct - under the EU Facility, (€72 billion in total, out of which €11,5 billion available, among others, for CFP support), the Commission can support the implementation of specific areas under the CFP, such as the conservation of marine biological resources and the support of ocean policy through investments in scientific advice, data collection and control? Please indicate the exact legal provisions to this support. **HU** Environmental, economic and social sustainability of aquaculture are no less important than those of fisheries. **PL** Including in their national reform plans a contribution to the environmental, economic and

PUBLIC

Commission proposal	Drafting suggestions	Comments
	States in accordance with Article 22(2) of Regulation (EU) No 1380/2013.	social sustainability of fishing activities and a balance between the fishing capacity of fleets and available fishing opportunities - requires clarification of the provisions in order to specify at this level which environmental, economic and social measures are eligible for funding.
	PT 2. Member States shall take into account in their NRP Plan the contribution to environmental, economic and social sustainability of fishing operations**, their contribution for the cohesion of coastal communities, employment and food security,** and the balance between the fishing capacity of the fleets and the available fishing opportunities as reported annually by Member States in accordance with Article 22(2) of Regulation (EU) No 1380/2013.	**PT** The fishing ativity is crucial for the cohesion of coastal communities, employment and food security, in particular in periods of geopolitical instability.
		SI Slovenia agrees with other comments calling for a clarification what is meant by "the contribution of fishing operations to environmental, economic and social sustainability". Also, Slovenia believes it needs to be clarified in the text that taking into account "the balance between the fishing capacity of the fleets and the available fishing opportunities" will not be interpreted as representing a condition which would limit the co-financing of operations related to commercial marine fishing by the Member States.
	FI	**FI**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	Delete.	CFP rules should be followed in any case, what is the relevance of this paragrapf? **SE** How will the 'Do No Significant Harm' (DNSH) principle be ensured when supporting energy transition measures in the fisheries sector, particularly in cases where such measures may result in increased fishing capacity? We understand that the Commission intends to present guidelines in early 2027, but would appreciate further clarification on how Member States will be able to adapt their National and Regional Partnership (NRP) plans in light of these forthcoming guidelines, especially considering the timing.
3. Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. For operations related to small-scale coastal fishing, Member States may grant a maximum 100 % aid intensity rate.	**BE** 3. Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. ~~For operations related to small-scale coastal fishing, Member States may grant a maximum 100 % aid intensity rate.~~	**BE** (Unfair) advantage for one fleet segment. Only this fleet segment is defined in the [the NRP regulation, Art. 4]. It is difficult to explain this preferential treatment. **BG** The transfer of responsibility to Member States to determine the aid intensity for the different categories of operations would lead to inequality between countries in the implementation of policy objectives. It is necessary to lay down specific rules for intensity rate implementation

PUBLIC

Commission proposal	Drafting suggestions	Comments
	CZ Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. For operations, **in justified cases,** ~~related to small-scale coastal fishing~~, Member States may grant a maximum 100 % aid intensity rate. **DE** 3. Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. For operations related to small-scale coastal fishing**, and for other duly justified operations including inland fisheries and aquaculture,** Member States may grant a maximum 100 % aid intensity rate. **IE**	**CZ** The Czech Republic expects that, in accordance with Article 3(3), it will be possible to apply a 100% support rate to other measures and beneficiaries as well. It is important to us that full support be made available to all key beneficiaries, not solely to operators engaged in small-scale coastal fisheries. (for example operations in public interest). **DE** See above for the definition of small-scale coastal fishing. It should be ensured that aid intensity of up to 100 % is not only allowed exclusively for support to small-scale coastal fisheries. **EE** The terms "categories of intervention" and "aid intensity rates" are not defined. It seems that it is appropriate to define the aid intensities/support rate only in case of measures that fall under the state aid exemption in the Article 85 of NRP proposal. The specific mentioning of SSCF aind intensity raises question whether the 100% aid intensity can be used in case of other measures. **IE**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	3. Subject to Article 78 of Regulation XX (NRP Fund), for all operations that exceed EUR 400,000 Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. ~~For operations related to small-scale coastal fishing, Member States may grant a maximum 100 % aid intensity rate.~~	The NRP Regulation envisages support to all operations below EUR 400,000 being by means of financing not linked to cost, simplified cost options etc. Our understanding is that where operations exceed EUR 400,000 the NRP Regulation does not prescribe aid intensity rates, and Member States appear to have the flexibility required in relation to same. **ES** This Regulation is clearly commited to supporting small-scale fisheries by specifically stating that aid intensity rate may reach up to 100%. However, it does not set any minimum or maximum limits for other types of operations, leaving those decisions entirely at the discretion of each Member State. **HR** As regards paragraph 3, we welcome the flexibility provided for in determining the maximum aid intensity. However, we propose that the rates are set at measure level, and it is not clear whether the term "categories of operations" refers to measures. As regards the second sentence, which allows for a maximum aid intensity of 100% for small-scale coastal fishing, it is not clear whether this means that a rate of 100% cannot be set in other cases, for example

PUBLIC

Commission proposal	Drafting suggestions	Comments
		where the beneficiary is public body or public educational/research institution etc? **LT** Lithuania considers the provision controversial and questionable. Please explain: if and what are the limits (minimum to maximum) possible aid intensity rates to other types of intervention or group of interventions e.g. fleet, aquaculture, CLLDs, science, control and etc.?? Maybe MS could tailor their aid intensity rates without any specific conditions? Is 100% intensity rate is only available for SSCF? **NL** NL does not support the seemingly preferential status for small scale fisheries. As MS have full flexibility to choose aid intensity percentages, there is no need to explicitly mention this option for small scale fisheries in the regulation, as this limits flexibility for MS to deviate from this percentage. NL is concerned that with 100% aid intensity, MS are still confronted with 60% cofinancing percentage. **AT**

PUBLIC

Commission proposal	Drafting suggestions	Comments
		In the context of the EMFAF 2021–2027, the provisions concerning small-scale coastal fishing could also be applied to inland fishing. The question now arises as to whether this will also be the case under the new funding regime? With regard to Article 85 of the [NRP Regulation] on State aid, it should be noted that most EMFAF grants were exempt from State aid rules. It appears that under the new funding regime, aid in the fisheries and aquaculture sectors would no longer be exempt from State aid rules and would therefore have to be either exempted or notified. Is that correct?
	PL Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. For operations related to small-scale coastal fishing, data collection, Member States may grant a maximum 100 % aid intensity rate.	**PL** The Fisheries Data Collection Programme is the implementation of a Member State's obligation, the effects of which serve the common interest of citizens. Bearing in mind the source of funding for this programme in the EU Facility, as indicated by the European Commission, it is important that this issue be regulated at the legislative level.
	PT Member States shall set out in their NRP Plan the maximum aid intensity rates for the different categories of operations supported under the NRP Plan. For operations related to small-scale	**PT** Text must clarify if small-scale fishing will be supported by the ammount of 2.000 million € ring-fenced for interventions in the framework of the CFP.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	coastal fishing, Member States may grant a maximum 100 % aid intensity rate, **from the ammount ring-fenced for CFP interventions.**	**SI** Slovenia would like to highlight that other activities might benefit from 100 % aid intensity and need to be included here in addition to small-scale coastal fishing. Such as activities implemented by public bodies or collective beneficiaries. Alternatively, it needs to be specified in this articles that a Member State itself may decide which activities other than small-scale coastal fishing may benefit from a higher aid intensity. **FI** How is this done in practice in the NRP-plan? Could a reference to the annex/table etc. be given? What is a "category of operations"? Such term does not excist in the NRP regulation. We would propose to set aid intensities based on measures not to category of operations. What operations/activities/interventions are covered, does this refer to the NRP art. 35.11. interventions or to all CFP, Ocean Pact related activities? It is understandable that the requirement to define aid intensities for categories of operations is justified for fisheries and aquaculture related measures, as Article 85 of the NRP Regulation

PUBLIC

Commission proposal	Drafting suggestions	Comments
		states that EU state aid rules do not apply to products from these sectors. However, it appears that the same requirement to establish aid intensities also applies to measures under the Ocean Pact and the broader blue economy. This raises concerns, as the blue economy encompasses a wide range of maritime activities, and support for these sectors is subject to EU state aid rules. Therefore, it is unclear why the national NRP plan must specify aid intensities for Ocean Pact and blue economy measures, while similar requirements do not apply to other economic sectors that are also governed by state aid rules. **SE** May grants be provided at a 100% aid intensity for interventions related to small-scale fisheries across all categories? Will there be further guidance or recommendations regarding applicable aid intensity rates?
4. An application for support submitted by an applicant shall be inadmissible for at least the time as defined in the delegated act as referred to in Article XX of Regulation XX [NRP Fund] (Control system for farm stewardship and common fisheries policy) if it has been determined by the competent authority that the applicant concerned:	**IE** NEW ARTICLE 'Admissibility of applications'	**EE** It seems that it is appropiate to define CFP specific rules in current proposal including the empowerment for the COM to establish more detailed rules. **IE**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	1. An application for support submitted by an applicant shall be inadmissible for at least the time as defined in the delegated act as referred to in Article XX of Regulation XX [NRP Fund] (Control system for farm stewardship and common fisheries policy) if it has been determined by the competent authority that the applicant concerned: **LT** Delete / move to art. 4 **PT** 4. An application for support submitted by an applicant shall be inadmissible for at least the time as defined in the delegated act as referred to in Article XX of Regulation XX [NRP Fund] (Control system for ~~farm stewardship and~~ **the** **C**ommon **F**isheries **P**olicy) if it has been	This should be a separate article titled 'Admissibility of applications', and merged with the Article 4 provisions as already set out **HR** It is not clear why the provisions related to the inadmissibility of support applications are partly covered by this proposal and partly by the proposal for a NRPF Regulation. We believe that they should be fully covered by either proposal. **LT** We suggest that this part - Article 3 (4)- better to be listed in Article 4 **NL** Under EMFF and EMFAF the terminology 'operator', is used in stead of 'applicant'. Is the scope of the regulation changed? Why is the term applicant used for this regulation? **PT** The decison must be clear and fixed in this regulation. However, in line with current Regulation 2021/1139 (EMFAF Regulation), if Commission is empowered to adopt delegated acts, the identification of the threshold triggering and the period of time of the inadmissibility referred, must be proportionate to the nature,

PUBLIC

Commission proposal	Drafting suggestions	Comments
	determined by the competent authority that the applicant concerned:	gravity, duration and repetition of the serious infringements, offences or fraud committed, and shall be at least one year's duration. **FI** The requirement for recoveries is currently set out in Article 62(6), (7), and (8) of the NRP Regulation. However, considering the nature of these provisions—relating to inadmissibility, sanctions, and the adoption of delegated acts—it might be more logical and transparent to include such rules directly in the Common Fisheries Policy (CFP) Regulation. Would it not be clearer and more coherent to establish the rules on inadmissibility, sanctioning, and delegated acts within the CFP Regulation itself, rather than in the NRP Regulation?
(a) has committed serious infringements under Article 42 of Council Regulation (EC) No 1005/2008[30] or Article 90 of Regulation (EC) No 1224/2009 or under other legislation adopted by the European Parliament and the Council within the framework of the CFP;	**ES** has committed serious infringements under Article 42 of Council Regulation (EC) No 1005/2008[30] or Article 90 of Regulation (EC) No 1224/2009 ~~or under other legislation adopted by the European Parliament and the Council within the framework of the CFP;~~ **LT** Delete / move to art. 4	**ES** Reference to "other legislation" introduces Lack of legal certainty and might bring disproportionate consequences fot operators involved.

PUBLIC

Commission proposal	Drafting suggestions	Comments
(b) has been involved in the operation, management or ownership of a fishing vessel included in the Union IUU vessel list as set out in Article 40(3) of Regulation (EC) No 1005/2008, or of a vessel flying the flag of countries identified as non-cooperating third countries as set out in Article 33 of that Regulation; or	**LT** Delete / move to art. 4	
(c) has committed any of the environmental offences set out in Articles 3 and 4 of Directive 2008/99/EC of the European Parliament and of the Council[31], where the application for support is submitted for the aquaculture specific interventions.	**LT** Delete / move to art. 4 **FI** Move to NRP-regulation.	**DE** GER suggest to verify whether Directive 2008/99/EC is still up-to-date or has not already been (partially) replaced by Directive (EU) 2024/1203 (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32024L1203) **EE** This requirement is not CFP specific and if needed should be established in NRP as horizontal exclusion criteria. **FI** This could be better suited as an horisontal article.
For the purposes of the verification referred to in the first subparagraph (a) of this paragraph, a Member State shall provide, on request from another Member State, the information contained in its national register of infringements referred to in Article 93 of Regulation (EC) No 1224/2009.	**LT** Delete / move to art. 4 **PT** (d) For the purposes of the verification referred to in the ~~first subparagraph~~ **point** (a) of this paragraph, a Member State shall provide, on	**PT** Text shortened and simplified to improve readability.

PUBLIC

Commission proposal	Drafting suggestions	Comments
	request from another Member State, the information contained in its national register of infringements referred to in Article 93 of Regulation (EC) No 1224/2009.	

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the Union support to the Common Fisheries Policy, to the European Ocean Pact and of the Union's maritime and aquaculture policy as part of the National and Regional Partnership Fund set out in Regulation (EU) [NRP Fund] for the period from 2028 to 2034 -
From: BE, BG, CZ, DE, EE, IE, EL, ES, HR, CY, LV, LT, HU, NL, AT, PL, PT, RO, SI, FI, SE Deadline: ***10/10/2025***
Updated: **16/10/2025 16:13**

PUBLIC

Commission proposal	Drafting suggestions	Comments
Article 4		

PUBLIC

Rules for providing support	**IE** Merge with the rules on admissibility above **RO**	**IE** All articles are related to admissibility of applications and are better grouped in a single article **HR** As regards Article 4, which sets out the rules for the provision of support, we welcome the exclusion of a number of detailed rules. However, we would stress that there is a high risk of different interpretations and understandings by different bodies during implementation, especially as the article establishes the rules by referring to compliance with the rules of the WTO Agreement, the TFEU and the CFP, with which not all stakeholders may be sufficiently familiar with or have the expertise given the functions they perform in the implementation of EU funds. For example, the WTO Agreement prohibits subsidies for fishing activities related to overfished resources (stocks). How would, for example, the Audit Authority verify compliance with this rule, given that it does not have a "black-on-white" definition of which resources (stocks) are these? **PL** . **RO**

PUBLIC

Commission proposal	Drafting suggestions	Comments
	New provision: Articles 107, 108 and 109 TFEU shall not apply to payments made by Member States pursuant to this Regulation and falling within the scope of Article 42 TFEU.	The same rationale regarding the state aid as in Regulation (EU) 2014/508 and Regulation (EU) 2021/1139 should also apply for the 2028-2034 programming period. **SI** All admissibility provisions related to the funding of the Common Fisheries Policy, the EU aquaculture and maritime policy, the European Ocean Pact and the marine ecosystems part of the Nature Restoration Regulation, should either be stated here or in the NRP Regulation.
1. Support to fishing fleet or operators that does not comply with the WTO agreement on fisheries subsidies and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation shall not be supported.	**BE** 1. Support to fishing fleet or operators that does not comply with the WTO agreement on fisheries subsidies**, as reffered to XX,** and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation shall not be supported.	**BE** BE cannot follow the direct reference to WTO provisions. Only provisions clearly defined in EU legislation can be directly applicable. **BG** Regarding the eligibility of operators linked to the WTO agreement, more detailed information is needed on how the text of the agreement will be applied, according to which support should not be provided for stocks that are overexploited. It is necessary for the provisions of the WTO agreement to clearly define the interaction between the European Commission and the Member States in determining which stocks are

PUBLIC

Commission proposal	Drafting suggestions	Comments
		considered "overexploited" in the context of this agreement. **EE** What happens if the WTO FISH2 agreement will not be reached in time and the FISH1 will be terminated based on Article 12 of this agreement? We would also draw attention to the fact that the definition of term "operator" different in the WTO agreement compared to the definition of Fisheries Control Regulation.
	ES Support to fishing fleet or operators that does not comply **~~with the WTO agreement on fisheries subsidies and~~** with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation shall not be supported.	**ES** This Article links aid eligibility to compliance with the WTO agreements on fisheries subsidies. It is necessary to analyze this wording carefully to avoid any future obstacle related to the interpretation of agreements that continue to evolve over time. **CY** This should be redrafted. The current wording excludes support to fishing fleet or operators by direct reference to the WTO Agreement on Fisheries Subsidies. The article specify the applicable rules and conditions within the Union framework, rather than by reference to an external international agreement.

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Many of the principles contained in the WTO Agreement are already reflected under Article 3.4 of this proposal. To ensure legal clarity, transparency, and consistency of interpretation, Cyprus suggests that the Regulation itself should set out the specific eligibility and compliance rules for support. **LT** Please clarify the reference to WTO agreement – the current one or also the future ones? Please explain what shall not be supported: a) Support to fishing fleet and b) operators that does not comply with the WTO agreement on fisheries subsidies and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation or c) Support to fishing fleet that does not comply with the WTO agreement on fisheries subsidies and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation and

PUBLIC

Commission proposal	Drafting suggestions	Comments
		d) operators that does not comply with the WTO agreement on fisheries subsidies and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation and if what does not comply – support (type of intervention) or fleet/ operator? **NL** NL shares the concern of the CLS. It's unusual to refer to a WTO-agreemend in a European regulation. NL has concerns about the uniformity of application of WTO-rules with this regulation.
	PT 1. Support to fishing fleet or operators that does not comply with **international agreements on fisheries, including** the WTO agreement on fisheries subsidies, and with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation shall not be.	**PT** We suggest a more comprehensive text on international fisheries agreements, not limited to the WTO agreement on fisheries subsidies. **SI** The text of paragraph 1 of this article gives the impression that Member States will be allowed to co-finance all activities which are not in contravention of the WTO fisheries subsidies agreement and the objectives of the Common Fisheries Policy. Thus, based on this article, this Regulation will allow the renewal of the fishing fleets for more sustainable fishing without

PUBLIC

Commission proposal	Drafting suggestions	Comments
		increasing the fishing capacity. Slovenia would like to kindly ask the Commission to confirm this interpretation, and to make sure this is subsequently taken into account in the applicable Commission guidance documents. aking into account the entry into force of the WTO fisheries subsidies agreement on 15 September this year, Slovenia would also be grateful to get information from the Commission which stocks that are managed on EU level they consider as "overfished".
	FI ~~Support to~~ fishing fleet or operators that does not comply ~~with the WTO agreement on fisheries subsidies and~~ with the objectives of the CFP as referred to in Article 43(2) TFEU, and Article 2 of the CFP Regulation shall not be supported.	**FI** The reference to an international agreement is a novel approach and its legal certainty is questionable. **SE** We would appreciate clarification on whether this provision is meant to go beyond the scope of Article 3(4)(b), or if it should be interpreted as equivalent in practice.
2. Beneficiaries shall be required to continue to comply with the CFP and not to commit any of the infringements and offences listed in Article 3 (4) points (a) to (c) within 5 years.		**BE** We have a scrutiny reservation on this. **BG** We consider the five-year period for complying with the specified requirements to be too long, which, in turn, will lead to retroactive

PUBLIC

Commission proposal	Drafting suggestions	Comments
		adjustments and the introduction of mechanisms for reducing the aid. **EE** In order to reduce administrative burden it seems appropriate to decrease the time period.
	IE 2. ~~Beneficiaries shall be required to continue to comply with the CFP and not to commit any of the infringements and offences listed in Article 3 (4) points (a) to (c) within 5 years.~~ If any of the situations referred to in paragraph X of this Article occurs throughout the period between submitting the application for support and five years after the final payment, the support paid under the NRP and related to that application shall be recovered from the operator, in accordance with Article XX (currently 62) of Regulation XX (NRP Regulation)	**IE** Suggest this wording, which is used in the EMFAF Regulation Article 11, is better phrased and should be used in respect of this provision, and relevant provision of NRP should be cited
	ES ~~Beneficiaries shall be required to continue to comply with the CFP and not to commit any of the infringements and offences listed in Article 3 (4) points (a) to (c) within 5 years.~~	**ES** This Article preserves the restriction we are already facing under the current EMFAF, whereby an operator who commits a certain infringement within five years after the final payment of the aid must repay it. This requirement is excessive, therefore it is necessary

PUBLIC

Commission proposal	Drafting suggestions	Comments
		to soften or, if possible, eliminate it, as it represents a significant administrative burden. **CY** This should be deleted as it creates a lot of administrative burden. Any checks on this should only apply untill the date of financing.
	NL "[…] ~~within 5 years~~ **five years after the final payment.**"	**NL** "Within 5 years" from which moment? Under EMFAF this was "five years after the final payment".
	PL 2a. All types of operation eligible under EFMRA shall be considered as eligible under NRP Fund. 2b. By way of derogation from Article 78 of the NRP Fund, support for operations pursuing the general objective set out in Article 2(d) of the NRP Fund, whose total cost does not exceed EUR 400,000, may also be provided in the form of grants.	**PL** The legislative act in question does not propose any measures. Considering that in the new programming period the EC proposes to extend its powers to include the possibility of requesting the inclusion of new measures or modifications proposed by a Member State, in Poland's opinion, defining only a broad range of objectives in Articles 2 and 3 of the NRP Fund Regulation, while at the same time refraining from establishing even a basic catalogue of actions and mandatory measures acceptable to the EC, may result in considerable discretion in the approval of NRP Plans by the EC and, consequently, unequal treatment of Member States.

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Taking into account the information provided by the EC (22-23 September, AGRIFISH) regarding the maintenance of the eligibility of all measures that can be implemented under the EMFAF in the new programming period, PL requests that such a provision be included Setting a fixed minimum amount for measures that can be financed in a form other than simplified costs will significantly hamper investment activities carried out by small fishing enterprises. Taking into account the effects of Russia's ongoing military aggression, price fluctuations and market uncertainty, it is not possible to determine simplified costs for investment measures, which in the case of the fisheries sector will in most cases not exceed EUR 400,000.
	FI Delete p. 2.	**FI** Ambiguity with NRP article 62. p. 6-8.
3. The transfer or reflagging of fishing vessels to third countries, including through the creation of joint ventures with partners of third countries and the transfer of ownership of a business are not eligible to receive support.		**BG** Ineligibility on support for the transfer of ownership of a business contradicts the goals of attracting young people to the sector and the policies for generational renewal. We propose that this point be rephrased so that it does not prohibit support for ownership transfer when it is related to generational renewal.

PUBLIC

Commission proposal	Drafting suggestions	Comments
		EE What is meant by "transfer of ownership of a business" and why is this prohibited? Taking into account that one of the challenges that fisheries sector faces is generational renewal, interventions to support entry of younger people to the sector should be supported by any means, including for example supporting the transfer of business from retiring fisherman to young fisherman. Does this prohibition exclude also the equity-based financial instruments, which by default include transfer of ownership? Are the equity-based instruments prohibited only under the CFP measures or does this prohibition apply to the whole NRP financing?
	IE 3. ~~The transfer or reflagging of fishing vessels to third countries,~~ Where support under the NRP is granted in respect of a Union fishing vessel, that vessel shall not be transferred or reflagged outside the Union during at least five years from the final payment for the supported operation. This includ~~esing~~ through the creation of joint ventures with partners ~~of~~ in third countries	**IE** This is not phrased well. Suggest text from EMFAF Regulation Article 15 be used here **HR** Paragraph 3 stipulates that the transfer or reflagging of fishing vessels to third countries, including through the creation of joint ventures with partners of third countries and the transfer of ownership of a business are not eligible to receive support. Does the ineligibility of the transfer of ownership of the undertaking apply only to third countries or to all operations? For example, does

PUBLIC

Commission proposal	Drafting suggestions	Comments
		it also apply to the transfer of ownership of the undertaking in the case of support for intergenerational renewal and young fishermen, where a young fisherman would transfer the business from a retired fisherman? Does this provision also applies in cases of transfering or reflagging of fishing vessels to third countries as stipulated under article 29 (support for activities in or in relation to third countries) of the NRPF Regulation? **LT** We had similar requirement, but it's not totally clear that it means: a) or it means that expenditures contributing direct to the selling or buying ownership of the fishing company or fishing vessel can't be supported, b) or it means, that we can't support operations if fishing company or vessel is owned or partially owned by natural or legal person from third country, c) on it means, that after operation was supported, for a certain period (how long??) ownership of the fishing company or vessel ant be transferred to

PUBLIC

Commission proposal	Drafting suggestions	Comments
		the natural or legal person from third country? **NL** This article corresponds with article 13d of Regulation 2021/1139. We've noticed however that a similar article as article 15 of regulation 2021/1139 ("Where support under this Chapter is granted in respect of a Union fishing vessel, that vessel shall not be transferred or reflagged outside the Union during at least five years from the final payment for the supported operation.") does not return in this regulation proposal. We were wondering if something similar should not be taken up in this regulation. **SI** Slovenia agrees with other comments that given the challenges of generational renewal, interventions to support entry of younger people to the sector should be supported by any means, including supporting the transfer of business from retiring fisherman to young fisherman.
	NL […] not eligible to receive support **and shall not be eligible to rensfer or reflag a vessel outside the union during at least five years from the payment for the supported operation.**	
4. Deep sea mining shall not be supported.		**DE** It should be considered whether this provision only applies in the framework of this regulation or more broadly in the overall MFF framework. **EE**

PUBLIC

Commission proposal	Drafting suggestions	Comments
		Does this provision apply only to CFP measures of the whole NRP financing? Does it apply also for EUFacility? **NL** What is the definition of 'Deep sea mining'? Can an explanation be given as to why deep sea mining shall not be supported? The Netherlands considers determining a position regarding deep sea mining a national competence. **FI** Note that this will not ban support for deep sea mining from other parts/chapters of NRP.
Article 5	**FI** ADD new article X: ***Committee procedure*** **The Commission shall be assisted by a committee which shall be set up in accordance with Article 88 [NRP].**	**FI** In to consideration that other sectoral NRP-regulations have a rule about committee, this could be usefull for the CFP as well.
Entry into force and application		
This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.		
It shall apply from the date of application of Regulation (EU) […] establishing the National	**PT** It shall apply from **1 January 2028**.	

PUBLIC

Commission proposal	Drafting suggestions	Comments
and Regional Partnership Fund for the period 2028-2034.		
This Regulation shall be binding in its entirety and directly applicable in the Member States in accordance with the Treaties.		
Done at Brussels,		**EE** During previous programming periods MS-s have developed databases on CFP financing. Why the COM proposes to abolish Infosys reports?
For the European Parliament *The President*		**EE** It seems appropriate to establish a committee on financing of CFP.
For the Council *The President*		