

**Ireland's Written Comments on the proposal for the Regulation of the European Parliament and of the Council amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control**

**Initial Comments on the 4 Column Document**

**30 August 2021**

**General Comments**

Ireland thanks the Presidency for the opportunity to comment on this document. Throughout these negotiations Ireland has reiterated its support for a robust compliance system that creates a level playing field across Member States. It is essential that the principles of a level playing field and a practical and workable control system are maintained during the up coming trilaterals.

Our initial comments on this document are set out below. We are examining the document in detail and reserve the right to add to or amend our initial comments.

**Point 214a – Art. 10 (1a)** – Ireland has concerns regarding the derogation proposed by the Parliament. It is not clear what type of incidents the Parliament foresees that would create a safety issue with the automatic identification system operating.

**Point 241 – Art. 14 (4)** – Ireland recognises that margins of tolerance are required for practical purposes but these need to be limited in nature to ensure accurate reporting of catches, which is a core pillar of the Common Fisheries Policy.

**Points 527c-e – Art. 55a** – Ireland prefers the more detailed article proposed by Council (Article 54d) in relation to fishing without vessels.

**Point 949c – Art.93a** – The Parliament's proposed amendment regarding a Union register of infringements is a significant proposal. We are currently examining the proposed amendment and will comment in detail in due course.

**Point 1099b – Art. 113 3** – Ireland prefers the original wording from the 2009 Regulation.