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NOTE

From:	General Secretariat of the Council
To:	Working Party on Fisheries Policy

N° prev. doc.:	WK 1669/22
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Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Regulation (EC) No 1224/2009, and amending Council Regulations (EC) No 768/2005, (EC) No 1967/2006, (EC) No 1005/2008, and Regulation (EU) No 2016/1139 of the European Parliament and of the Council as regards fisheries control - Table with several rows in view of the trilogue of 11 February 2022 - Comments by Estonia
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**Estonian written comments on Proposal for a Regulation as regards fisheries control:
Presidency compromise doc WK 1699/2022**

We can gladly note that the proposed changes and ideas on way forward in Document WK 1699/2022 are acceptable to Estonia. We still have a few comments we would like to share:

Row 508k – in 2 a „(a) a unique fishing day identification number“ we would prefer if „fishing trip identification number“ would be used. That would be consistent with Article 14 para 2a.

Row 714d – we prefer GA, but we do understand that „in part“ is open for interpretation regarding potential percentage

Row 770 – we are of the opinion that perhaps more technical and detailed discussion is needed on this point. Regarding the text proposal by Denmark we find the 1st change very good: „*together with*“ refers to stronger cooperation, which in our experience is indeed beneficial. However, the 2nd edition by Denmark referring to the fact that the Member State should be in charge of the inspection raised some questions for us. For example regarding cases where a vessel is landing its catch not at a flag state port, but in a port on another MS territory. Then, in case of onboard inspections the inspector in charge would be of the flag state, but outside the ship it would be the port state. Agreements between different MS regarding shared inspections are possible (and used in practice) already, but we think it is worth considering which text proposal would deliver best results and also mean more effective infringement procedures. For this purpose, a technical discussion based on real/potential examples may deem useful.

Rows regarding national control programmes and respective reports – we are of the opinion that annual updating and reporting, respectively, would be unreasonably often. This would mean a considerable increase in administrative burden that is hard to cope with, especially for smaller member states with small administrations. An interval of 3-4 years would be more suitable for updating national control programmes and submitting reports.