



Council of the European Union
General Secretariat

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NOTE

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

Delegations will find attached written comments by [the German delegation](#) on the above-mentioned document.

Comments of Germany on WK 1699/2022– Sequences 4 (Fishing without a vessel), 6 (national control programmes, monitoring, and inspections) and 15 (Control of the landing obligation – CCTVs)

14 February 2022

Germany thanks the Presidency for the proposed ways forward regarding Sequences 4, 6 and 15 of the EU control regulation in working paper WK 1699/2022.

Apart from comments on lines 770, 955, 956 and 956d below, Germany generally supports defending the Council's approach, where this is indicated as proposed way forward.

Comments on specific lines

Line 770: Regarding inspections on the territory of Member States, Germany needs more time to discuss the second sentence with the Länder and reserves scrutiny.

Lines 955 and 956: We support the COM proposal in line 955 suggesting that Member States shall notify their national control programmes to the Commission no later than three months from their establishment or update.

Concerning the annual report on controls and inspections as it is mentioned in line 956, we strongly encourage not introducing a second report. Instead of establishing a new report, the already existing evaluation report on the specific control and inspection programmes (established by the Commission Implementing Decision (EU) 2018/1986) could be extended with a public and non-public part if necessary. A new annual report would double many of the already existing reporting obligations and cause supplementary bureaucracy.

Due to the federal structure in Germany, it would not be feasible to publish such an annual report on 31 March. Member states should be able to submit their annual report until the end of April.

Line 956d: We point out that the “detected infringements” constitute only a small number out of the total number of “suspected infringements” and we therefore doubt that focusing on the detected infringements has a benefit.