**Justifications for and against EMFF amendments**

**ARTICLES TO REJECT**

1. **Fleet renewal/vessel construction (Article 32b)**
   - Construction of new and modern fishing vessels, even small boats, increases fishing capacity. 2 out of 3 fish stocks in the EU are currently being overfished. There are currently already too many boats compared to the quota and therefore profitability is low.
   - It is up to fishermen to invest in boats, not tax payers.
   - Vessel construction subsidies were abolished in the EU in 2002. The EU cannot go backwards.
   - Governments of Germany, Sweden, Finland, Denmark, Poland and the UK have already said they will not support subsidies for boat construction. Only a few Member States are likely to use them as in the past, i.e. Spain, Portugal and France.

2. **Engine replacement (Article 39 (1) a)**
   - Engine replacement subsidies will make boats more powerful and increase their capacity. There are today too many boats for too few fish and too little quotas, hence the low profitability of the industry.
   - It is up to fishermen to invest in engines and fishing gears, not tax payers.
   - Provisions to reduce the power of new engines are impossible to control. The power can very easily be increased on a new engine.

3. **Temporary cessations (New article 33A)**
   - Temporary cessations are financial compensations to fishermen for stopping activities over a certain period. In an optimized fishery, vessels would not stop fishing for long periods, as stocks would be healthy enough to support on-going fishing activities.
   - The need for temporary cessations is an indication of too many fishing boats. Instead of subsidizing cessation, number of boats should be decreased.

**ARTICLES TO SUPPORT**

1. **Capping amounts for direct subsidies (Article 27 (3) Council common position)**
   - Support for direct fleet measures (e.g. modernisation, engine replacement) should be limited, to allow a majority of the subsidies to be spent on measures supporting the implementation of the CFP reform.
   - In the light of the uneven distribution of subsidies in EU, a cap would also certify a limited distortion of markets and secure an even support to fleets.

2. **Data collection (Article 15(4))**
   - The state of EU stocks is not well-known: there is no data available for 65% of EU stocks, despite a requirement on Member States to collect data.
   - Appropriate decisions on how much fish can be caught without threatening stocks can only be taken on sound scientific advice, based on robust data. Subsidies must finance data collection to support a sustainable future for EU fisheries.

3. **Control and enforcement (Article 78)**
   - Member States and fishing authorities need financial support for the implementation of the CFP reform. Control and enforcement is a key part, which subsidies should support.
   - Subsidies should be used for the purchase and installation of CCTV cameras on board, IT systems, electronic recording and reporting systems (ERS), vessel monitoring systems (VMS), used for control purposes.