

9 December 2025

**Subject: Urgent actions to ensure 2026 fishing opportunities and scientific advice to underpin future decisions fully reflect EU legal requirements and policy objectives**

Dear Commissioner Kadis,

We, the undersigned organisations working on fisheries and environmental policies, write to you regarding the imminent December Council meeting and the upcoming renewal of the “Specific Grant Agreement” and the overarching “Framework Partnership Agreement” between the European Commission and the International Council for the Exploration of the Sea (ICES) which guide the provision of scientific advice on fishing opportunities.<sup>1,2</sup>

**We urge you to advance key improvements to the scientific advisory process through the renewal of these two vital agreements to address the shortcomings we wrote to you about in April<sup>3</sup> and August.<sup>4</sup>** We welcome your commitment to strengthening the scientific advice for fisheries management as per your recent reply to the Low Impact Fishers of Europe (LIFE).<sup>5</sup> This is fundamental to deliver the European Ocean Pact’s (EOP) core goal of maintaining a “*healthy, resilient and productive ocean*” that can sustain thriving, sustainable fisheries and coastal communities. The drastic decline of major commercial fish populations across all negotiation fora - such as mackerel, Northern Shelf cod, Celtic Sea haddock and pollack, Skagerrak and Kattegat sole, and most Baltic stocks - shows that the need to boost stock recovery and ecosystem resilience is more pressing than ever.

**It is high time to not only end overfishing, but to finally put stock recovery and ocean health explicitly at the heart of fisheries decisions and the scientific advice that underpins them.** As highlighted in our previous correspondence and joint Briefing,<sup>6</sup> the current scientific advice on fishing opportunities is not explicitly designed to (a) rebuild fish populations, (b) be sufficiently precautionary (across all relevant timescales and beyond the single-stock perspective), and (c) safeguard wider ecosystem health. Improvements to the two key agreements between ICES and DG MARE are critical to fixing this as they provide the framework for the EU’s requests for scientific advice. We strongly support your recent statement at the “Our Baltic” conference emphasising that “*the ICES advice is not a target, it is a maximum quantity*”,<sup>7</sup> which is closely aligned with our key ask to set fishing limits below this level by default.<sup>8</sup>

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<sup>1</sup> [This year’s Specific Grant Agreement 4500095912](#) under Framework Partnership Agreement MARE/2023/ICES.

<sup>2</sup> [The current Framework Partnership Agreement](#), establishing long-term cooperation for the award of EU grants.

<sup>3</sup> [Joint letter](#), co-signed by 17 organisations, regarding the renewal of the Specific Agreement with ICES, 11 April 2025.

<sup>4</sup> [Joint letter](#), co-signed by 31 organisations, regarding fishing opportunities for 2026. 28 August 2025.

<sup>5</sup> [Response](#) of 29 November 2025 from Commissioner Kadis to LIFE’s letter from 30 October.

<sup>6</sup> [Joint Briefing](#) “‘Best available’ is not good enough - addressing shortcomings in the current scientific advice”, as part of our comprehensive [joint Briefing Series](#) “Recommendations to the EU and the UK on fishing opportunities”.

<sup>7</sup> [Opening remarks](#) by Commissioner Kadis at the third edition of “Our Baltic Conference”, Stockholm, 30 September 2025.

<sup>8</sup> See our [joint letter](#) and our [joint Briefing Series](#) from August 2025.

**The recent statement by the Commission and Baltic Sea Member States, following the October AGRIFISH Council, committing to requesting rebuilding advice,<sup>9</sup> is a welcome step towards this, but on its own is not enough.** As you suggested in your response to our April letter, we have continued to raise our concerns and recommendations in various fora, including with Member State representatives, through Advisory Councils, with your counterparts in the UK and directly with ICES contacts. We note however, that certain key processes - such as work undertaken between advice requesters and ICES on rebuilding - have not been open to us so far. A statement by Sweden on ecosystem-based scientific advice<sup>10</sup> shows that the 29 organisations who co-signed our joint Briefing<sup>11</sup> - including environmental NGOs, recreational fishers, fishing rights owners and LIFE - are not alone in our call for a change to the advisory system. Ongoing and upcoming work within ICES<sup>12,13</sup> indicates that ICES is also ready to look at possible improvements. We are now looking to you to move this forward.

**The Commission and other ICES advice clients need to explicitly request advice from ICES that aims to rebuild fish populations and maintain ocean health while minimising risks to both. Specifically, the European Commission, where necessary involving collaboration between DG MARE and DG ENV and/or with other ICES advice clients, should take the following steps to implement our previously outlined recommendations:<sup>14</sup>**

- 1. Swiftly act on the recent Commission and Member States' commitment to request ICES to provide advice on rebuilding Baltic Sea fish populations, and extend this approach to all stocks that are below sustainable levels,** not just Baltic Sea ones. Requests should include clear, ambitious timeframes, target biomass levels and precautionary thresholds.<sup>15</sup> The Commission should urgently engage with other relevant ICES advice clients for shared stocks as needed.
- 2. Ensure that, throughout the renewal of the Specific Grant Agreement and the Framework Partnership Agreement between ICES and DG MARE, both Agreements are designed to yield explicit requests for scientific advice that is recovery-focused, sufficiently precautionary and ecosystem-based,** including explicit reference to delivering Good Environmental Status (GES). Where ICES is not yet in a position to provide such advice, the ICES/EU agreements should commit to ensuring that shortcomings in the available advice are clearly presented.
- 3. Support fishing opportunities for 2026 that as a default aim for lower catch levels than those presented in the current single-stock ICES headline advice,** as the shortcomings we wrote to you about in April and August are still unresolved.
- 4. Include a clear commitment in all written negotiation agreements to addressing remaining shortcomings as swiftly as possible** to ensure that future negotiations

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<sup>9</sup> As referred to in the [Commission's press release](#) on the outcome of the October AGRIFISH Council and included in the [draft minutes](#) thereof (14646/25), p. 13.

<sup>10</sup> Statement by Sweden on ICES advice and ecosystem-based fisheries management, included in the [October AGRIFISH Council draft minutes](#) (14646/25), p. 14.

<sup>11</sup> [Joint Briefing](#) "‘Best available’ is not good enough - addressing shortcomings in the current scientific advice".

<sup>12</sup> For example, the [WKREBUILD2](#) process developed concrete suggestions for a path towards advice aimed at rebuilding depleted or struggling fish populations, but these have not been implemented yet.

<sup>13</sup> ICES also seems to be planning a workshop (WKREFRAME) - yet to be scheduled - to examine the advisory approach.

<sup>14</sup> See our [joint letter](#) from April and our [joint Briefing](#).

<sup>15</sup> Also see this [recent scientific paper](#) by Winker et al. (2025) which found that "The ICES MSY approach to reference point estimation is not precautionary". ICES Journal of Marine Science, Volume 82, Issue 11, November 2025, [fsaf204](#).

can be based on scientific advice that fully reflects all relevant legal sustainability requirements and policy objectives. As part of this, the Commission and relevant negotiation partners should also commit to developing a roadmap with ICES for exploring the use of Management Strategy Evaluations (MSEs) as a key fisheries management tool for an increasing number of stocks.

**5. Actively involve and consult interested stakeholders in all relevant processes** related to addressing shortcomings in the scientific advice on fishing opportunities.

**You as the Commissioner for Fisheries and Oceans and your services have the power and responsibility to chart the EU's course towards delivering on the EOP's core aims** as well as key legal sustainability requirements and objectives in the Common Fisheries Policy, the EU's Multi-Annual Plans and the Marine Strategy Framework Directive.

We urge you to take the above key steps to ensure our ocean and all who depend on it can thrive in a changing climate, and we stand ready to support your services along the way. We would welcome the opportunity to discuss these recommendations further and look forward to your response.

Kind regards,



Anaïs Berthier  
Head of Brussels, ClientEarth

On behalf of:

