

Dr. István Nagy  
Minister of Agriculture  
Hungary<sup>1</sup>

12 September 2024

**Subject: NGOs call on you to set sustainable, ecosystem-based fishing opportunities for 2025**

Dear Minister Dr. István Nagy,

Like every busy autumn, soon you will be back at the negotiation table in the Agrifish Council meetings and in third country negotiations with the UK and other coastal states to decide on fishing opportunities for the coming year. As the Council Presidency, you will play a key role in overseeing and leading this year's Agrifish discussions. **We urge you to set and reach a clear objective for these negotiations: to significantly improve the state of fish populations, as a key investment in a healthy ocean that can support thriving, sustainable fisheries and coastal communities in the long-term. This means setting precautionary fishing opportunities well below the best available scientific advice on maximum catches and target fishing mortality,<sup>2</sup> in order to finally end overfishing and maximise long-term ecosystem health, productivity and resilience in the face of mounting pressures like climate change.**

Despite the overall reduction in overfishing brought about by the Common Fisheries Policy (CFP) in the last decade, the EU still failed to fulfil its legal obligation to end overfishing in all its waters and missed the deadline to harvest all stocks sustainably by 2020, with many fishing limits still set above scientific advice.<sup>3</sup> Meanwhile, **the current scientific advice used to inform fishing opportunities**, including Total Allowable Catches (TACs) and fishing days, **is not designed to fully account for and safeguard ecosystem integrity and dynamics. Therefore, the habit of setting fishing opportunities at best at, but often still above and rarely below this advice, jeopardises long-term population and ocean health, eroding the foundations of thriving fisheries for generations to come.**

In October, you will set EU fishing opportunities in the Baltic Sea, where overfished populations are not improving, and the cod crisis continues.<sup>4</sup> In the meantime, the consultations with the UK will resume with a view to establishing over 70 catch limits for shared stocks, most of which still exceeded scientific advice last year.<sup>5</sup> Those shared with Norway and other coastal states will follow shortly, with comprehensive sharing arrangements for key pelagic stocks like mackerel still lacking.

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<sup>1</sup> A similar letter as well as the attached recommendations have also been sent to the European Commission's Executive Vice-President for the European Green Deal, Interinstitutional Relations and Foresight, who is currently leading the fisheries portfolio, whereas a UK version of the recommendations has been sent to the UK Secretary of State for Environment, Food and Rural Affairs, excluding references to fisheries management in the Mediterranean.

<sup>2</sup> Advice on catch limits for most Northeast Atlantic stocks is provided by ICES, whereas STECF provides advice for the Mediterranean, including regarding target fishing mortality under the [western Mediterranean multi-annual plan](#).

<sup>3</sup> ClientEarth (2023). [Taking stock 2023 - are TACs set to achieve MSY?](#) November 2023.

<sup>4</sup> Please see specific [Joint NGO recommendations on Baltic Sea fishing opportunities for 2025](#). 18 June 2025.

<sup>5</sup> Centre for Environment Fisheries and Aquaculture Science (Cefas) (2024). [Assessing the sustainability of fisheries catch limits negotiated by the UK for 2024](#). 10 April 2024.

In December, you will finalise decisions for the Northeast Atlantic as well as the Mediterranean and Black Seas, where 30% and 61% respectively of assessed stocks continue to be subject to overfishing.<sup>6</sup> The dire state of the critically endangered European eel<sup>7</sup> also continues to be a key issue for discussion.

**Productive and resilient fisheries depend on a healthy environment.** Overfishing and destructive practices have been the main cause of marine biodiversity loss for the last 40 years and they critically undermine the resilience of fish and other wildlife to the impacts of climate change and their capacity to mitigate it.<sup>8</sup> Long-term and widespread socio-economic losses will outweigh short-term and private profits if the EU and its negotiation partners continue to set fishing opportunities above scientific advice and fail to account for ecosystem dynamics and to safeguard their functioning.

**In the face of accelerating threats from the twin nature and climate change emergencies, there is no more time to lose. We therefore urge you to finally deliver on your commitments and future-proof EU fisheries by:**

- **Setting catch limits well below the best available scientific single-stock advice for maximum catches** provided by the International Council for the Exploration of the Sea (ICES), where this does not yet fully reflect and safeguard ecosystem integrity and dynamics and/or is not explicitly geared towards rapid recovery above sustainable population levels. This is crucial in order to maximise long-term population and ecosystem health, productivity, resilience and capacity to mitigate climate change, and to account for discarding. This applies regardless of whether the advice is based on Maximum Sustainable Yield (MSY) or on the data-limited precautionary approach.
- **Fully implementing the western Mediterranean multiannual plan (West Med MAP),** particularly through the adoption of legally-mandated safeguard measures for fish populations outside safe biological limits as well as further fishing effort restrictions. Member States should also agree on better-designed technical measures to ensure they effectively reduce juvenile bycatch and prevent overfishing, and consider the potential addition of new gears, species and catch limits to the West Med MAP. This is crucial to tackle excessive fishing mortality and achieve MSY exploitation rates by 2025 at the latest.<sup>9</sup>
- **Applying a precautionary and ecosystem-based approach when setting fishing opportunities, with special attention to mixed fisheries and interspecies dynamics.** This means setting fishing opportunities in the Northeast Atlantic below the ICES single-stock advice, and in the Mediterranean in line with bringing fishing mortality below the

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<sup>6</sup> European Commission, Joint Research Centre, Scientific Technical and Economic Committee for Fisheries (STECF) Monitoring the Performance of the Common Fisheries Policy (STECF-Adhoc-24-01), Gras, M., Pierucci, A., Mantopoulou Palouka, D., Kupschus, S. and Konrad, C. editor(s), Publications Office of the European Union, Luxembourg, 2024, <https://data.europa.eu/doi/10.2760/547228>, JRC137731, e.g. Tables 3 and 4, p. 31, with 25 out of 83 assessed stocks still fished unsustainably in 2022. For the Mediterranean: Figure 20, p. 52, with 39 out of 64 stocks still fished above  $F_{MSY}$  in 2021, the most recent year with the relevant data.

<sup>7</sup> ICES (2023). European eel (*Anguilla anguilla*) throughout its natural range. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.21907860.v1>.

<sup>8</sup> IPCC. 2019. [Special Report on the Ocean and Cryosphere in a Changing Climate](#). IPBES. 2019 [Global Assessment Report on Biodiversity and Ecosystem Services](#).

<sup>9</sup> The deadline to achieve a sustainable exploitation rate by 2025 at the latest, beyond the original 2020 deadline in the Common Fisheries Policy to end overfishing, was established exceptionally for the demersal stocks managed under the in the [western Mediterranean multiannual plan](#).

target fishing mortality from the Scientific, Technical and Economic Committee for Fisheries (STECF) advice:

(a) for the more abundant stocks in mixed fisheries, in order to safeguard and prioritise the recovery of vulnerable and/or depleted stocks caught in those fisheries, while urgently developing and implementing effective rebuilding plans for all stocks that are below sustainable levels; and

(b) for forage fish, where ecosystem dynamics (such as the need for a sufficient food supply for other fish, seabirds and marine mammals) are not fully factored in yet. The science needed to better account for these needs must be urgently commissioned.

- **Eliminating bycatch and discards, increasing selectivity, incentivising low impact fishing through quota allocation based on environmental and social criteria and diligently controlling fisheries** by remote electronic monitoring (REM) with cameras, supported by onboard observer coverage as appropriate. Full catch documentation and accounting for discards and potential underreporting in a precautionary way is particularly crucial in fisheries with bycatch of vulnerable and/or depleted stocks or sensitive species.
- **Increasing transparency of decision-making** in line with the UNECE Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, by fully documenting and publishing information on negotiations, including initial positions.

The implementation of the CFP is a mission not yet accomplished.<sup>10</sup> The EU, including the Commission, the Council and individual Member States, must act now to remedy this situation, if the EU is to respect its own law and international commitments, as well as deliver on the European Green Deal and Biodiversity Strategy. The CFP's success and the EU's credibility are at stake. Environmental organisations will continue to scrutinise the EU's progress in ending overfishing and transitioning to fully sustainable, climate-smart and transparent fisheries that allow ecosystems to thrive in the long-term.

Please find our specific recommendations attached. We thank you for your consideration and look forward to meeting you and your services to discuss them in detail.

Yours sincerely,



Pascale Moehrle  
Executive Director and Vice President, Oceana in Europe

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<sup>10</sup> For more aspects of CFP implementation, please see the NGO policy paper "[Common Fisheries Policy: Mission Not Yet Accomplished](#)" (2021). NGOs identify nine specific challenges in this paper (overfishing, especially in the Mediterranean Sea, the LO, harmful impacts of fishing, the transition to low-impact fisheries, harmful subsidies, regionalisation, the external dimension, and climate change) and propose a list of actionable solutions. Also see Pew's "[Lessons From Implementation of the EU's Common Fisheries Policy](#)" (2021).

On behalf of:

Bass Angling Conservation, BirdLife Europe, BirdWatch Ireland, BLOOM Association, Blue Marine Foundation, ClientEarth, Deep Sea Conservation Coalition, Deutsche Umwelthilfe e.V. (DUH), Dutch Elasmobranch Society, Ecologistas en Acción, FishSec, France Nature Environnement (FNE), Friends of the Irish Environment, German Foundation for Marine Conservation (DSM), North Sea Foundation, Oceana, Sciaena, Seas At Risk, Shark Trust, Whale and Dolphin Conservation



BirdWatchIreland



ecologistas  
en acción



DEUTSCHE STIFTUNG  
MEERESSCHUTZ (DSM)



BLUE MARINE  
FOUNDATION



Deutsche Umwelthilfe



SHARK  
TRUST

The North Sea  
Foundation



SHARK  
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