Mr Stephen Morgan MP
Parliamentary Under-Secretary of State
Department for Environment, Food and Rural Affairs
UK Government[1]

18 November 2026

Subject: Set sustainable, ecosystem-based fishing limits for 2027

Dear Minister,

We write to you ahead of the negotiations between the EU and the UK on fishing limits for 2027, which will shape the future of fisheries for years to come. While negotiations on some widely distributed stocks have already concluded, you are yet to set many catch limits for fish stocks shared among the EU, the UK and Norway and other coastal states in the Northeast Atlantic.

Like last year, we urge you to set and reach a clear objective for these negotiations: to recover shared fish populations and safeguard them against unsustainable declines. This is a key step towards achieving a healthy ocean that can support thriving, sustainable fisheries and coastal communities into the future. This means setting precautionary fishing limits well below the best available scientific advice for maximum catches, to finally end overfishing and maximise long-term stock and ecosystem health, productivity and resilience in the face of mounting pressures like climate change.[2]

Science-based management is a cornerstone not only of the fisheries chapter of the EU-UK Trade and Cooperation Agreement but is also key to the EU's Common Fisheries Policy and the UK's Fisheries Act. Numerous international agreements, including the United Nations Fish Stocks Agreement, the Convention on Biological Diversity and UN Sustainable Development Goal 14, required fishing sustainably by 2020. Both the UK and the EU missed this deadline and failed to achieve Good Environmental Status (GES) by the very same year, as legally required under the UK's Marine Strategy Regulations 2010.[3]

An increasing number of fish populations are in a dire state across various sea basins. The continued crisis in the Baltic Sea, where cod populations have collapsed following decades of overfishing coupled with wider ecosystem challenges, should serve as a cautionary tale: put on the emergency brakes now and invest in recovery and resilience - or keep sending ecosystems and fisheries in other areas like the Celtic and Irish Seas into a similar downward spiral.

Importantly, the scientific advice used to inform fishing limits does not fully reflect all the relevant legal requirements and policy objectives: it is not sufficiently recovery-focused, precautionary or designed to account for and safeguard ecosystem integrity and dynamics.[4] Setting fishing limits at best at, but often still above and rarely below this advice, jeopardises long-term population and ocean health, as well as the livelihoods that depend on it.

---

1 An equivalent letter including the same recommendations for fishing limits in the Northeast Atlantic has been sent to the European Commissioner for Fisheries and Oceans, including EU-specific references to fisheries management in the Mediterranean.
2 See our joint Briefing Series, and particularly the Cover Briefing, with detailed recommendations to the EU and the UK on fishing opportunities.
3 DEFRA, DAERA, Welsh Government and Scottish Government (2026). UK Marine Strategy Part One: UK Updated assessment and Good Environmental Status. April 2026. This assessment confirms that all elements of the fish components have not met GES, stating that "*extraction of biomass through fishing activities remains the dominant pressure on fish populations*".
4 See Briefing 3 in our joint Briefing Series on shortcomings in the scientific advice on fishing opportunities and a number of joint letters to the EU Commissioner on the same topic (15 April 2025, 9 December 2025).

We remain concerned that **the decisions taken by the UK and the EU behind closed doors are at odds with their public commitments and legal obligations and fail to apply the necessary precaution in the face of ecosystem-related uncertainty and knowledge gaps**. Both parties claim leadership on tackling the biodiversity and climate crises, yet unsustainable exploitation of fish populations, impacting ocean health and resilience, seriously undermines these claims. For example, less than 40% of the 2026 catch limits involving the UK,[5] mostly referring to stocks shared with the EU, followed scientific advice. The 2026 UK Marine Strategy assessment shows only two out of 15 GES indicators have been met. Setting fishing limits above scientific advice - advice which in itself is not designed to deliver GES - will continue to prevent the UK from achieving GES for commercial fish and shellfish (D3) and food webs (D4).

Productive and resilient fisheries depend on a healthy marine environment. If poor decisions on fishing opportunities continue to undermine stock recovery and erode already fragile ecosystems, there is no future for thriving fisheries and coastal communities. Long-term and widespread socio-economic losses will outweigh short-term and private profits if the UK and the EU continue to set catch limits above scientific advice and fail to account for ecosystem dynamics and vulnerability and to safeguard ecosystem functioning.

As the UK Fisheries Minister, you have the power and the responsibility to put the UK on a path towards truly sustainable, recovery-focused and ecosystem-based fisheries. This includes ensuring that the UK's negotiating position is geared towards this goal and reminding negotiation partners of the benefits of investing in stock and ocean health, and the costs - both environmental and socio-economic - of failing to do so.

In the face of growing threats from the twin nature and climate emergencies, we therefore urge you to deliver on your commitments and future-proof UK and EU fisheries by:

- **Setting recovery-focused, precautionary and ecosystem-based catch limits, with special attention to mixed fisheries and interspecies dynamics. This means setting them <u>well below</u> the scientific single-stock advice for maximum catches** provided by the International Council for the Exploration of the Sea (ICES):

  (a) where this advice does not yet fully reflect and safeguard ecosystem integrity and dynamics, is not explicitly geared towards rapid recovery above sustainable population levels, and/or does not meet legal safeguards against dangerous population declines;[6]

  (b) 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;[7] and

  (c) 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.[8]

5 Gilmour, F. and Bell, E. 2026. Assessing the sustainability of negotiated fisheries catch limits by the UK for 2026. Cefas project report for Defra. 35pp.
6 See the Cover Briefing and Briefing 3 of our joint Briefing Series for detailed explanations and recommendations.
7 See Briefings 6 and 9 in our joint Briefing Series.
8 See Briefings 3 and 5 in our joint Briefing Series.

- **Respecting the legally binding safeguards in the EU's Multi-Annual Plans (which are part of Retained EU Law in the UK)**, by setting catch limits that do not exceed the legal 5% risk limit of stocks falling below the level where reproductive capacity may be impaired.[9]
- **Recognising shortcomings in the ICES scientific single-stock advice on fishing opportunities and the UK's and EU's requests for it, and committing to work with ICES to develop a clear roadmap for how to swiftly address them**.[10] For bilaterally shared stocks between the UK and EU, such a commitment should be included in the agreed written record for the negotiations.
- **Eliminating bycatch and discards, increasing selectivity, incentivising low impact fishing through quota allocation based on environmental and social criteria, and diligently controlling fisheries**. This should include the use of remote electronic monitoring (REM) with cameras, supported by onboard observer coverage as appropriate. Full catch documentation and accounting for discards and potential under-reporting is particularly crucial in fisheries with catches 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.

We thank you for your time and consideration. We hope to see significant progress in ending overfishing in the Northeast Atlantic, as well as a transition to fully sustainable, climate-smart and transparent fisheries that allow fish populations, ecosystems, fishers and coastal communities to thrive in the long-term. This autumn's fisheries negotiations are also a key opportunity to turn the tide on the UK's failure to achieve GES.

Please find attached the Cover Briefing of our joint Briefing Series which contain our specific recommendations. We look forward to meeting you and your departments to discuss them in detail. This is one of a wide range of marine conservation issues connected with fisheries management and achievement of GES we are focused on and we remain at your disposal for further engagement on each of these.

Yours sincerely,



Kyle Lischak
Head of UK
ClientEarth

9 The EU's Multi-Annual Plans (MAPs) applicable in the UK as part of Retained EU Law contain the clear requirement to set fishing opportunities in a way that keeps the risk of stocks falling below B_{lim} below 5%, see Article 4(6) of the North Sea MAP and Article 4(7) of the Western Waters MAP. While the relevant wording was adjusted in UK law to apply only to stocks above B_{lim}, the difficulty to recover stocks from below B_{lim} illustrates the importance of minimising the risk of them falling to such low levels in the first place.
10 See Briefing 3 in our joint Briefing Series.

On behalf of:

Angling Trust, Bass Angling Conservation, BLOOM Association, Blue Marine Foundation, British Spearfishing Association, ClientEarth, Coalition Clean Baltic, Coastwatch, Défense des Milieux Aquatiques (DMA), Deutsche Stiftung Meeresschutz (DSM), Deutsche Umwelthilfe e.V. (DUH), European Anglers Alliance (EAA), Friends of the Irish Environment, Irish Wildlife Trust, Marine Conservation Society, Northern Ireland Marine Task Force (NIMTF), North Sea Foundation, Oceana, Open Seas, Royal Society for the Protection of Birds (RSPB), Sciaena, Seas At Risk, Shark Trust, Whale and Dolphin Conservation, Wildlife and Countryside Link, WWF

