Mr Timmy Dooley TD
Minister of State at the Department of Agriculture, Food and the Marine with special responsibility for Fisheries
Ireland[1]

18 November 2026

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

Dear Minister Dooley,

We write to you regarding the negotiations on the setting of fishing limits for 2027, which will shape the future of fisheries for years to come. 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 recover fish populations - in terms of both their size and condition - and safeguard them against unsustainable declines. This is key to achieving the European Ocean Pact's goal of maintaining a "*healthy, resilient and productive ocean*" that can support thriving, sustainable fisheries and coastal communities into the future.[2] This means setting precautionary fishing opportunities well below the best available scientific advice on maximum catches and target fishing mortality,[3] to finally end overfishing and maximise long-term fish population and ecosystem health, productivity and resilience in the face of mounting pressures like climate change.[4]

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.[5] Additionally, both the EU and the UK failed to meet their legal obligation to achieve Good Environmental Status (GES) by the very same year.

An increasing number of fish populations are in a dire state across various sea basins,[6] including for example cod, whiting and haddock - once key commercial stocks sustaining profitable mixed fisheries - in the Celtic Sea. 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 opportunities 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.[7] Setting fishing opportunities at best at, but often still above and rarely below

1 A similar letter as well as the attached joint Briefing Series with our recommendations have also been sent to the European Commissioner for Fisheries and Oceans, whereas a UK version of the recommendations has been sent to the Parliamentary Under-Secretary of State at the UK's Department for Environment, Food and Rural Affairs, excluding references to fisheries management in the Mediterranean.
2 This wording was used for example in the European Commission's call for evidence to shape the EOP. 20 January 2025.
3 Advice on catch limits for most Northeast Atlantic stocks is provided by the International Council for the Exploration of the Sea (ICES), whereas the Scientific, Technical and Economic Committee on Fisheries (STECF) provides advice for the Mediterranean, including regarding target fishing mortality under the western Mediterranean multi-annual plan.
4 See our joint Briefing Series, and particularly the Cover Briefing, with detailed recommendations to the EU and the UK on fishing opportunities.
5 ClientEarth (2024). Taking stock 2024 - are TACs set to achieve MSY? November 2024.
6 The Commission recognised in its recent CFP evaluation report that progress on stock rebuilding is lacking and the number of stocks "*threatened by collapse due to impaired recruitment has increased during the reporting period*" (p. 28).
7 See Briefing 3 in our joint Briefing Series on shortcomings in the scientific advice on fishing opportunities and a number of joint letters to Commissioner Kadis (15 April 2025, 9 December 2025) on the same topic, in response to which he confirmed that his services are "*committed to*

this advice, jeopardises long-term population and ocean health, as well as the livelihoods that depend on it.

Productive and resilient fisheries depend on a healthy marine environment. If poor decisions on fishing opportunities continue to undermine stock recovery and to erode already fragile ecosystems, there is no future for thriving fisheries and coastal communities that depend on them. 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 vulnerability and to safeguard ecosystem functioning.

As the Council Presidency, you have the power and the responsibility to work with the Council and the European Commission to put the EU on a path towards truly sustainable, recovery-focused and ecosystem-based fisheries. This includes reminding other Member State representatives of the benefits of investing in stock and ecosystem health by exercising restraint, and the costs - both environmental and socio-economic - of failing to do so.

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

- **Setting recovery-focused, precautionary and ecosystem-based fishing opportunities, with special attention to mixed fisheries and interspecies dynamics. This means setting them <u>well below</u> the ICES scientific single-stock advice** for maximum catches, and, in the Mediterranean, in line with bringing fishing mortality below the target fishing mortality advised by the STECF:

  (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;[8]

  (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;[9] 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.[10]

- **Respecting the legally binding safeguards in the EU's Multi-Annual Plans (which are part of Retained EU Law in the UK)**, by proposing and setting catch limits that do not exceed the legal 5% risk limit of stocks falling below a level where reproductive capacity may be impaired.[11]

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ensuring that the Grant Agreement [which guides the provision by the International Council for the Exploration of the Sea of scientific advice on fishing opportunities] incorporates provisions whereby scientific advice is recovery-focused, precautionary, and ecosystem-based".

8 See the Cover Briefing and Briefing 3 of our joint Briefing Series for detailed explanations and recommendations.

9 See Briefings 6 and 9 in our joint Briefing Series.

10 See Briefings 3 and 5 in our joint Briefing Series.

11 Three of the EU's Multi-Annual Plans (MAPs) contain the clear requirement to set fishing opportunities in a way that keeps the risk of stocks falling below B_{lim} below 5%. This is included in Article 4(6) of the Baltic Sea MAP and the North Sea MAP and in Article 4(7) of the Western Waters MAP.

- **Recognising shortcomings in the ICES scientific single-stock advice on fishing opportunities and the EU's and UK's requests for it, and supporting the European Commission in working with ICES to develop a clear roadmap for how to swiftly address them**.[12] For bilaterally shared stocks between the EU and UK, a commitment to advancing such work should be included in the agreed written record for the negotiations.
- **Fully implementing the western Mediterranean multiannual plan (West Med MAP)**, by adopting the legally-mandated safeguard measures for fish populations below precautionary limits. Member States should also agree on further reductions in fishing mortality through a combination of fishing effort restrictions, catch limits, area closures and improved gear selectivity. This is crucial to tackle high fishing mortality and avoid further delays in meeting MSY exploitation rates beyond the 2025 deadline.[13]
- **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 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.

This autumn we count on you to lead the Council towards fisheries decisions that finally end overfishing and transition to fully sustainable, climate-smart and transparent fisheries that allow fish populations, ecosystems, fishers and coastal communities to thrive in the long-term.

Please find attached the Cover Briefing of our joint Briefing Series which contains our specific recommendations. We thank you for your consideration and look forward to discussing them in detail with you and your officials.

Yours sincerely,



Anaïs Berthier
Head of Brussels and Associate Director for Europe
ClientEarth

12 See Briefing 3 in our joint Briefing Series.
13 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.

On behalf of:

Bass Angling Conservation, BirdLife Europe, BLOOM Association, Blue Marine Foundation, 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, North Sea Foundation, Oceana, Sciaena, Seas At Risk, Shark Trust, Whale and Dolphin Conservation, WWF

