

Mr Virginijus Sinkevičius  
Commissioner for Environment, Oceans  
and Fisheries  
European Commission

Ms Thérèse Coffey MP  
Secretary of State for Environment, Food  
and Rural Affairs  
UK Government

14 September 2023

**Subject: NGOs call on you to set sustainable, ecosystem-based fishing limits for 2024**

Dear Commissioner, Dear Secretary of State,

We write ahead of the negotiations between the EU and the UK on fishing limits for 2024, which will have consequences for fisheries for years to come. You will set over 100 catch limits for fish stocks shared among the EU, the UK, Norway and other coastal states in the Northeast Atlantic. **We urge you to set and reach a clear objective for these negotiations: to significantly improve the state of shared fish populations, for the sake of the environment and the people. This means setting fishing limits not exceeding, and preferably well below, the best available scientific advice for maximum catches, in order to end overfishing and maximise long-term ecosystem health, productivity and resilience in the face of mounting pressures like climate change.**

Science-based management is a cornerstone not only of the fisheries chapter of the EU-UK Trade and Cooperation Agreement but is also enshrined in the EU's Common Fisheries Policy and in the UK's Fisheries Act. Numerous international agreements, including the United Nations Fish Stocks Agreement, the Convention on Biodiversity and UN Sustainable Development Goal 14, all required fishing sustainably by 2020, a deadline missed both by the EU and the UK.

We remain concerned that **the decisions taken by the EU and the UK behind closed doors are at odds with their public commitments and legal obligations.** Both parties claim leadership on tackling the biodiversity and climate crises we all face, but unsustainable exploitation of fish populations seriously undermines the credibility of such claims. Only 40% of the 2023 catch limits involving the UK,<sup>1</sup> mostly referring to stocks shared with the EU, followed scientific advice, and 26% of fully assessed stocks are still overfished in the Northeast Atlantic.<sup>2</sup>

**Productive 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>3</sup>

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1 Bell, ED, Nash, RMD, Garnacho, E, De Oliveira, J, Hanin, M, Gilmour, F, O'Brien, CM (2023). [Assessing the sustainability of negotiated fisheries catch limits by the UK for 2023](#). Cefas project report for Defra. 30 pp.

2 Scientific, Technical and Economic Committee for Fisheries (STECF), Monitoring of the performance of the Common Fisheries Policy ([STECF-adhoc-23-01](#)), Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/361698, JRC133325, p. 3.

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

Long-term and widespread socio-economic losses will outweigh short-term and private profits if the EU and the UK continue to set catch limits 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 emergency, there is no more time to lose. We therefore urge you to finally deliver on your commitments and future-proof EU and UK fisheries by:**

- **Setting catch limits not exceeding, and preferably well below, the best available scientific advice for maximum catches** provided by the International Council for the Exploration of the Sea (ICES). This is crucial in order to maximise long-term stock 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.
- **Applying a precautionary and ecosystem-based approach when setting catch limits, with special attention to mixed fisheries and interspecies dynamics.** This means setting catch limits below the ICES single-stock 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; and (b) for forage fish, where ecosystem needs (such as 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, and diligently controlling fisheries** by using 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.

We thank you for your time and consideration and 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.

Please find our specific recommendations attached. We look forward to meeting you and your departments to discuss them in detail.

Yours sincerely,



Pascale Moehrle  
Executive Director  
Oceana in Europe



Hugo Tagholm  
Executive Director  
Oceana in the UK

On behalf of:

BirdLife Europe, BirdWatch Ireland, Bloom Association, Blue Marine Foundation, ClientEarth, The Danish Society for Nature Conservation, Deep Sea Conservation Coalition (DSCC), Défense des Milieux Aquatiques (DMA), Deutsche Umwelthilfe (DUH), Dutch Elasmobranch Society, Ecologistas en Acción, Fair Seas, The Fisheries Secretariat, Friends of the Irish Environment (FIE), Marine Conservation Society (MCS), Oceana in Europe, Open Seas, Royal Society for the Protection of Birds (RSPB), Sciaena, Seas At Risk, Shark Trust, Whale and Dolphin Conservation (WDC)



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