

# BRIEFING SERIES: Recommendations to the EU and the UK on the setting of fishing opportunities



## Stocks not managed by a Total Allowable Catch

Briefing 10 of 11

July 2025

### About this Briefing Series

This Briefing Series, supported by the 29 undersigned organisations, is designed to assist the responsible decision-makers in the European Union (the European Commission, the Council of the EU and the Member States) and the United Kingdom (the UK Government and devolved administrations) in managing fishing opportunities in a way that:

- ◆ Finally ends overfishing,
- ◆ Significantly contributes to restoring and/or maintaining all fish stocks above healthy levels and to minimising levels of incidental catches, and
- ◆ Safeguards marine ecosystem functioning and resilience, also in light of mounting pressures like climate change.

The Series consists of 11 Briefings covering the following topics related to the setting of fishing opportunities:<sup>1,2</sup>

- ◆ 1. [Cover Briefing](#): Key recommendations on setting fishing opportunities
- ◆ 2. [Context and legal framework](#)
- ◆ 3. [“Best available” is not good enough - addressing shortcomings in the current scientific advice](#)
- ◆ 4. [Shared fish stocks](#)
- ◆ 5. [Fishing opportunities in an ecosystem context](#)
- ◆ 6. [Mixed fisheries considerations](#)
- ◆ 7. [The fishing effort regime in the Western Mediterranean Sea](#)
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- ◆ 11. [Deep Sea stocks](#)

In order to ensure that fishing opportunities support thriving fisheries while safeguarding ocean health, resilience and productivity, we call on decision-makers to follow all of our recommendations across the entire Briefing Series.

## About this Briefing

Many fish populations are not currently managed by a Total Allowable Catch (TAC), and some of them have been exploited unsustainably. This is despite the fact that the EU's and the UK's recovery objectives and the requirement to apply a precautionary and ecosystem-based approach apply to all harvested species, whether subject to a TAC or not. This Briefing provides recommendations for the sustainable, precautionary and ecosystem-based management of stocks that are not subject to a TAC, including:

- ◆ Introducing effective management measures for all non-TAC stocks;
- ◆ Assessing and minimising fisheries impacts on non-quota species and other marine life;
- ◆ Ensuring that the prohibited species list has clear criteria for uplisting and removal of species;
- ◆ Ensuring a continued and swift recovery of sea bass, and requesting scientific advice geared towards delivering this; and
- ◆ Stopping all targeting of fishing for critically endangered European eel and urgently introducing measures that address habitat loss and water quality in priority areas.

**A few stocks which are currently not subject to a Total Allowable Catch (TAC) have been exploited unsustainably for several years.**<sup>3</sup> Examples include the critically endangered European eel, European sea bass in the North Sea, Irish Sea, English Channel, Bristol Channel and Celtic Sea and sardine in the Cantabrian Sea and Iberian Atlantic waters. In addition, very few effective management options have been explored for minimising bycatch of vulnerable and critically endangered species like tope shark (*Galeorhinus galeus*).

**The Maximum Sustainable Yield (MSY) objective in Article 2(2) of the Common Fisheries Policy (CFP) Basic Regulation, as well as the sustainability and precautionary objectives of the UK Fisheries Act apply to all “harvested species” or “marine stocks”, whether subject to a TAC or not.**<sup>4</sup> Likewise, both the precautionary approach and the ecosystem-based approach are fundamental principles that must underpin EU and UK fisheries management in general. It is crucial that effective stock-specific measures be introduced, particularly where no TAC is in place to regulate fishing levels, to ensure that vulnerable stocks are restored above sustainable levels, in line with legal requirements and the UK's and EU's wider sustainability ambitions.

<sup>1</sup> Over the years, the NGOs working on fishing opportunities have been providing a range of annually updated recommendations for different sea basins and groups of species. Many of our key recommendations and concerns are cross-cutting and do not change from year to year. For 2025 onwards, we have consolidated these points into this Briefing Series which is intended to remain valid for years to come. The Series will be complemented by bespoke regionally or topically specific recommendations as appropriate and current scientific state of the art findings.

<sup>2</sup> Cross-references will be included throughout the text using the relevant Briefing numbers. Full references to all Briefings are listed in ANNEX 1.

<sup>3</sup> For specific recommendations on fisheries management in the Western Mediterranean, where reductions in fishing days are the primary tool to reach the target fishing mortality for stocks under the West Med MAP, please see Briefing 7.

<sup>4</sup> Also see Briefing 2 for details on relevant legal provisions and context.

The fact that we know very little about the true catch levels of some of these species further strengthens the case for Remote Electronic Monitoring (REM) to improve data for their sustainable management. We therefore provide the following recommendations below for stocks not managed by a TAC.

## Recommendations for stocks not managed by a TAC

- ◆ **Introduce effective management measures for all non-TAC stocks** that aim to ensure each stock's recovery and sustainable exploitation in line with the CFP's and UK Fisheries Act's objectives, for example through recovery plans. In any cases where TACs have been removed and not reinstated, a quantitative evaluation of potential alternative management measures and their efficiency should be urgently conducted, as recommended by ICES for several deep-sea stocks in 2018,<sup>5</sup> to ensure the CFP's and UK Fisheries Act's objectives are met for the affected stocks. Management of non-TAC stocks should also be underpinned by REM to provide robust data on capture of these species.
- ◆ **Assess and minimise the impact of fisheries for stocks subject to TACs on non-quota species and other marine life.** For example, high numbers of dab are caught in the plaice and sole fishery in the North Sea, but mostly discarded, with a discard rate of over 90%.<sup>6</sup> This should be addressed by setting TACs for the relevant target stocks at lower levels and implementing effective bycatch reduction measures to minimise the impact on associated non-quota stocks.
- ◆ **Ensure that the prohibited species list has clear criteria for uplisting and removal of species.** There is a clear need for transparent criteria for the listing of prohibited species to ensure that species that are in need of protection can be listed and species that have recovered can be sustainably exploited again.<sup>7</sup>
- ◆ **Ensure a continued and swift recovery of sea bass, and request scientific advice geared towards delivering this:** The spawning stock biomass was in 2024 still estimated to be below  $MSY_{B_{trigger}}$  and  $B_{pa}$  (i.e. outside safe biological limits) and projected to decrease based on ICES headline advice,<sup>8</sup> showing that this advice is not designed to recover the stock. The issues with the current advisory approach outlined in Briefing 3 must be urgently addressed in order to ensure that future ICES advice on sea bass catch levels is designed to deliver a swift recovery. Until this is the case, catches should be limited to well below the headline advice to allow for a continued recovery of the stock. Finally bycatch, which represented 65% of all commercial bass landings in 2023 for example, must be dramatically reduced.
- ◆ **Add European eel to the prohibited species list, stop all targeted fishing for eel, both commercial and recreational, and urgently introduce measures that address habitat loss and water quality in priority areas.** European eel is a shared stock with the UK and other countries and is subject to targeted fishing in both the EU, the UK and many other countries, despite being listed as Critically Endangered by the International Union for Conservation of Nature (IUCN).<sup>9</sup> The 2024 scientific advice from ICES on fishing opportunities for eel,<sup>10</sup> provided to both the EU and the UK, is zero catch of all life stages and in all habitats, including eels used for restocking and aquaculture.

<sup>5</sup> ICES (2018): EU request for ICES to provide advice on a revision of the contribution of TACs to fisheries management and stock conservation for selected deep-water stocks. ICES Advice: Special Requests. Report. <https://doi.org/10.17895/ices.pub.4493>.

<sup>6</sup> ICES (2025). Dab (*Limanda limanda*) in Subarea 4 and Division 3.a (North Sea, Skagerrak and Kattegat). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27202581.v1>. Table 1, p. 2.

<sup>7</sup> Scientific, Technical and Economic Committee for Fisheries (STECF) – 71 st Plenary report (STECF-PLEN-22-03). Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/016673, JRC132078. On p. 9, "STECF concludes that there is currently no transparent decision-making procedure on which to include or exclude species from the prohibited species list."

<sup>8</sup> ICES (2024). Seabass (*Dicentrarchus labrax*) in Divisions 4.b–c, 7.a, and 7.d–h (central and southern North Sea, Irish Sea, English Channel, Bristol Channel, and Celtic Sea). Replacing advice provided in June 2024. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27222843.v1>.

<sup>9</sup> Pike, C, Crook, V, Golllock, M (2020). *Anguilla anguilla*. The IUCN Red List of Threatened Species 2020: e.T60344A152845178. <https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T60344A152845178.en>.

<sup>10</sup> ICES (2024). European eel (*Anguilla anguilla*) throughout its natural range. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27100516.v1>.

It also includes advice to bring all other anthropogenic mortalities to zero and to urgently restore habitats ensuring connectivity and water quality to support recovery of the population.

- ◆ **Do not resume UK international trade in eels.** With Brexit, the UK can no longer trade glass eels to the EU. In 2019, the UK requested advice from ICES regarding a potential UK non-detriment finding (NDF) for international trade in European eel in the context of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES),<sup>11</sup> and an NDF assessment was indeed produced in 2023.<sup>12</sup> This indicates an openness in the UK to resuming international trade in European eel, and the announcement in March 2025 that the UK banned eel exports to Russia suggests that international trade was occurring at least prior to that ban.<sup>13</sup> However, in light of the most recent ICES advice on eel fishing opportunities, its conservation status and the widespread illegal trade in glass eels, we strongly advise against pursuing this further.

Environmental organisations remain committed to the objectives of the Common Fisheries Policy, the UK Fisheries Act, the Marine Strategy Framework Directive and the UK's Marine Strategy Regulations 2010, as well as the Trade and Cooperation Agreement and other international agreements. We will continue to scrutinise the progress in ending overfishing and boosting long-term population and ecosystem health and resilience as we urge the European Commission, the Council of the EU, the Member States, the UK Government and devolved administrations to finally deliver the EU's and UK's transition to truly sustainable fisheries. This Briefing Series provides a clear and comprehensive list of recommendations on how to get there.

<sup>11</sup> ICES (2019): UK request for an independent review of the scientific basis for a UK non-detriment finding (NDF) for the international trade in European eel, seen in relation to CITES legislation. ICES Advice: Special Requests. Report. <https://doi.org/10.17895/ices.advice.4688>.

<sup>12</sup> Fleming, L.V., Walker, A., Evans, D., Aprahamian, M., James, M., Bašić, T., Watts, S., Horsburgh, G., Allin, R., Blake, K., Connor, S. & Littlewood, A.H.L. 2023. Non-detriment finding assessment for the export from the United Kingdom of CITES-listed European eel *Anguilla anguilla* (2023-26). JNCC Report 745, JNCC, Peterborough, ISSN 0963-8091. <https://hub.jncc.gov.uk/assets/20810981-e500-4207-a1df-b37cd9eb47e1>.

<sup>13</sup> Barkham, P (2025). Export of endangered eels to Russia ends after UK government ban. Article published in The Guardian on 28 March 2025. <https://www.theguardian.com/environment/2025/mar/28/export-of-endangered-eels-to-russia-ends-after-uk-government-ban>.

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The below contact details refer to the main contacts for each of the organisations supporting this Briefing Series, and are not Briefing-specific. We can help redirect any queries to the most appropriate colleagues for each individual Briefing.

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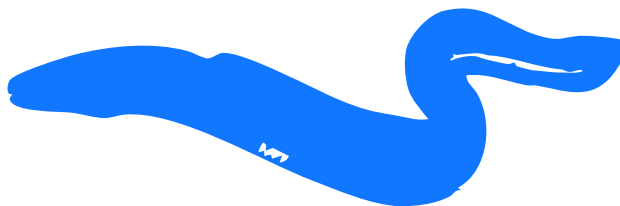
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## ANNEX 1 - FULL REFERENCES TO ALL BRIEFINGS IN THIS SERIES

This Briefing Series is supported by 29 organisations, including environmental NGOs and recreational representatives. [Briefing 3](#) is additionally supported by the Low Impact Fishers of Europe (LIFE), European Anglers Alliance (EAA), Baltic Salmon Fund and Baltic Salmon Rivers Association. [Briefing 7](#) about fisheries management in the Western Mediterranean Sea features fewer logos than the rest of the series since not all of the NGOs signatory to the Briefing Series are active in the Mediterranean.

**Briefing 1:** Cover briefing: Key recommendations on setting fishing opportunities. Briefing 1 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-1-cover-briefing-key-recommendations-on-setting-fishing-opportunities/>

**Briefing 2:** Context and legal framework. Briefing 2 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-2-context-and-legal-framework/>

**Briefing 3:** “Best available” is not good enough - addressing shortcomings in the current scientific advice. Briefing 3 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-3-addressing-shortcomings-in-the-current-scientific-advice/>

**Briefing 4:** Shared fish stocks. Briefing 4 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-4-shared-fish-stocks/>

**Briefing 5:** Fishing opportunities in an ecosystem context. Briefing 5 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-5-fishing-opportunities-in-an-ecosystem-context/>

**Briefing 6:** Mixed fisheries considerations. Briefing 6 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-6-mixed-fisheries-considerations/>

**Briefing 7:** The fishing effort regime in the Western Mediterranean Sea. Briefing 7 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-7-the-fishing-effort-regime-in-the-western-mediterranean-sea/>

**Briefing 8:** Landing obligation challenges. Briefing 8 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-8-landing-obligation-challenges/>

**Briefing 9:** Depleted stocks with zero or very low catch advice. Briefing 9 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-9-depleted-stocks-with-zero-or-very-low-catch-advice/>

**Briefing 10:** Stocks not managed by a Total Allowable Catch. Briefing 10 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-10-stocks-not-managed-by-a-total-allowable-catch/>

**Briefing 11:** Deep-sea stocks. Briefing 11 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-11-deep-sea-stocks/>

