

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



Context and legal framework

Briefing 2 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:^{1,2}

- ◆ 1. [Cover Briefing](#): Key recommendations on setting fishing opportunities
- ◆ 2. [Context and legal framework](#) (this briefing)
- ◆ 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](#)
- ◆ 8. [Landing obligation challenges](#)
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- ◆ 10. [Stocks not managed by a Total Allowable Catch](#)
- ◆ 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

This Briefing provides crucial context for the rest of the Briefing Series, by

- ◆ Highlighting that overfishing continues and fishing opportunities routinely exceed scientific advice;
- ◆ Outlining key legal requirements and policy objectives that must be met when setting fishing opportunities;
- ◆ Explaining some of the key obstacles to ending overfishing, such as a failure to date to prioritise the rapid recovery of depleted and struggling fish populations; and
- ◆ Emphasising the EU’s and UK’s shared responsibility to put stock recovery and ocean health, the foundation for any fisheries-related livelihoods, at the heart of fisheries decisions.

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.

Status quo: overfishing continues and fishing opportunities exceed scientific advice

Overfishing and destructive fishing practices have been the main causes of marine biodiversity loss for several decades. They also critically undermine the resilience of fish, crustaceans, corals, seabirds, marine mammals, and other wildlife to the impacts of climate change, as well as undermining their capacity to mitigate the latter.^{3,4} **Many European fish populations, most of which are shared between the EU and the UK, remain in a worrying state, without effective recovery efforts from either side to date.**⁵ This reflects the long-standing approach in both the EU and the UK of setting fishing opportunities above scientific advice and failing to prioritise stock recovery and to safeguard ecosystem health in the process.⁶

¹ 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.

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

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

⁴ Mariani, G, Cheung, WWL, Lyet, A, Sala, E, Mayorga, J, Velez, L, Gaines, SD, Dejean, T, Troussellier, M, Mouillot, D (2020): Let more big fish sink: Fisheries prevent blue carbon sequestration—half in unprofitable areas. *Science Advances* Vol 6, Issue 44. 28 October 2020. DOI: [10.1126/sciadv.abb4848](#).

⁵ For example, a study published in *Science* by Froese et al. (2025) refers to an “overfishing ratchet” due to a “strong bias for higher catches at every step [of the TAC-setting process], leading to TACs that often exceed what fishers are able to catch”. For the greater North Sea area, they report that “in 2022 only 28% of the 50 stocks with available data were in compliance with the legal objectives of MSY-capable biomass and sustainable fishing pressure”. Likewise, they state that 69% of the stocks with available data were “too small to produce MSY” and 35% “subject to ongoing overfishing”. Froese, R; Steiner, N; Papaioannou, E; MacNeil, L; Reusch, T B H; Scotti, M (2025). Systemic failure of European fisheries management. *Science* 388(6749), pp. 826-828. DOI: [10.1126/science.adv4341](#). May 2025.

⁶ See ClientEarth’s “Taking stock” report series, with the 2024 edition showing that about a quarter of the analysed 2024 TACs for EU-only and EU/UK shared stocks exceeded the scientific advice, following a slow decrease from a high of 71% in 2016. Taking stock 2024 – are TACs set to achieve MSY? November 2024. [https://www.clientearth.org/latest/documents/taking-stock-2024-are-tacs-set-to-achieve-msy/](#). Figure 1, p. 28.

Despite the reduction in overfishing brought about by the Common Fisheries Policy (CFP) in the Northeast Atlantic and Mediterranean since 2003,⁷ **the EU still missed the legal deadline to end overfishing and harvest all stocks sustainably by 2020 at the latest.**^{8,9,10} Meanwhile, the UK Government's own annual reports confirm that **progress in aligning fishing limits with scientific advice from the International Council for the Exploration of the Sea (ICES) since Brexit has been limited:** less than half of the Total Allowable Catches (TACs) negotiated by the UK for 2025,¹¹ the same as for 2024,¹² followed the advice, up from around a third in 2020, 2021 and 2022,¹³ and 40% in 2023.¹⁴

Legal framework and sustainability commitments

Both the EU and the UK have clear domestic obligations as well as international commitments regarding sustainable, precautionary and ecosystem-based fisheries management. The objective of ensuring that exploitation of marine stocks *"restores and maintains populations of harvested species above biomass levels capable of producing maximum sustainable yield"* is fundamental to both the EU's CFP¹⁵ and the UK Fisheries Act,¹⁶ as well as the EU-UK Trade and Cooperation Agreement (TCA).¹⁷ The same applies to the requirement to apply the precautionary and the ecosystem-based approach to fisheries management and the key principle of basing fisheries decisions on the best available scientific advice. Both the EU and the UK are also required to achieve Good Environmental Status (GES) by 2020, under the EU's Marine Strategy Framework Directive (MSFD) and the UK Marine Strategy Regulations 2010, respectively.

A range of "Fisheries Management Plans" (FMPs) have been under development (or are due to be developed) across the UK since Brexit, and EU Member States are subject to the EU's Multi-Annual Plans (MAPs) for the Baltic Sea and for demersal stocks in the western Mediterranean. Notably, the EU's MAPs for the North Sea and for western waters are part of EU Retained Law in the UK as well. These MAPs contain a clear requirement to set fishing opportunities in a way that keeps the risk of stocks falling below B_{lim} , the level below which there may be reduced reproductive capacity, below 5%.¹⁸ They also contain safeguards *"to ensure rapid return"* of any stock estimated to be below the reference $MSY B_{trigger}$ *"to levels above those capable of producing MSY"*.¹⁹

⁷ Scientific Technical and Economic Committee for Fisheries (STECF) - Monitoring the Performance of the Common Fisheries Policy (STECF-Adhoc-25-01), Publications Office of the European Union, Luxembourg, 2025, doi:XXXXXXX, JRCXXXXXX. https://stecf.ec.europa.eu/document/download/8e2882e4-433c-4218-a0ed-9254bd334d6d_en.

⁸ *Ibid.*

⁹ The requirement that *"the maximum sustainable yield exploitation rate shall be achieved [...] at the latest by 2020 for all stocks"* in Article 2(2) of, Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. This Regulation is hereafter referred to as "CFP Basic Regulation".

¹⁰ In the Western Mediterranean the deadline was set for 2025 under the Regulation (EU) 2019/1022 of the European Parliament and of the Council of 20 June 2019 establishing a multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea and amending Regulation (EU) No 508/2014. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R1022>. Referred to as "West Med MAP" in this Briefing Series.

¹¹ Gilmour, F., Bell, E., O'Brien, CM. 2025. Assessing the sustainability of negotiated fisheries catch limits negotiated by the UK for 2025. Cefas project report for Defra. 32 pp. 19 March 2025, see pp. 18, 22 and 29. <https://www.gov.uk/government/publications/assessing-the-sustainability-of-fisheries-catch-limits-negotiated-by-the-uk-for-2025>.

¹² 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. <https://www.gov.uk/government/publications/assessing-the-sustainability-of-fisheries-catch-limits-negotiated-by-the-uk-for-2024/assessing-the-sustainability-of-fisheries-catch-limits-negotiated-by-the-uk-for-2024>.

¹³ Bell, E., Nash, R., Garnacho, E., De Oliveira, J., O'Brien, C (2022). *Assessing the sustainability of fisheries catch limits negotiated by the UK for 2020 to 2022*. Cefas. 38 pp. 2 January 2022.

¹⁴ 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. 30pp.

¹⁵ Article 2(2) of the CFP Basic Regulation.

¹⁶ The "precautionary objective" in Article 1(3) of the [UK Fisheries Act](#) (2020).

¹⁷ Article 494(2) of the [Trade and Cooperation Agreement](#) between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland of the other part (2020).

¹⁸ *"Fishing opportunities shall in any event be fixed in such a way as to ensure that there is less than a 5 % probability of the spawning stock biomass falling below B_{lim} "*. This requirement is included in Article 4(6) of the North Sea MAP and the Baltic Sea MAP and Article 4(7) of the Western Waters MAP. [North Sea MAP](#): Regulation (EU) 2018/973 of the European Parliament and of the Council of 4 July 2018 establishing a multiannual plan for demersal stocks in the North Sea and the fisheries exploiting those stocks. [Western Waters MAP](#): Regulation (EU) 2019/472 of the European Parliament and of the Council of 19 March 2019 establishing a multiannual plan for stocks fished in the Western Waters and adjacent waters, and for fisheries exploiting those stocks. [Baltic Sea MAP](#): Regulation (EU) 2016/1139 of the European Parliament and of the Council of 6 July 2016 establishing a multiannual plan for the stocks of cod, herring and sprat in the Baltic Sea and the fisheries exploiting those stocks.

¹⁹ *Ibid.*, Article 7 of the North Sea MAP, Article 5 of the Baltic North Sea MAP, Article 8 of the Western Waters MAP and Article 6 of the Western Mediterranean MAP. As defined for example in Article 2(9) of the Western Waters MAP, *" $MSY B_{trigger}$ " means the spawning stock biomass reference point, or, in the case of Norway lobster, abundance reference point provided for in the best available scientific advice, in particular from ICES or a similar independent scientific body recognised at Union or*

Both the EU and the UK are also subject to key sustainability commitments and obligations under international law such as the United Nations Convention on the Law of the Sea (UNCLOS),²⁰ the United Nations Fish Stocks Agreement (UNFSA),²¹ the Convention on Biological Diversity (CBD) and the United Nations Sustainable Development Goal (SDG) 14.²²

However, **although some progress has been made for commercially important fish populations since the early 2000s, both the EU and the UK have failed to deliver on these crucial requirements and objectives:** official reports on both sides of the Channel confirm that GES has not been achieved,^{23,24} with commercial fishing being identified as one of the “predominant human pressures preventing GES being achieved”,²⁵ and many fish populations remain in a dire state.

Obstacles to ending overfishing

Justifications for the failure to end overfishing presented by EU and UK decision-makers often revolve around a lack of scientific data, the lower economic importance of certain stocks or the risk of “choking” other fisheries if scientific advice for stocks caught primarily as bycatch was followed (also see Briefing 6).²⁶

In this context, it is worth recalling that, in a legal case regarding the CFP’s missed 2020 MSY deadline,²⁷ the Court of Justice of the European Union (CJEU) ruled in 2024 that, while this deadline indeed applies to all target stocks (i.e. overfishing them beyond 2020 is illegal) the Council has some margin of discretion for “bycatch” stocks under certain conditions. This discretion applies in relation to situations where following the scientific advice would lead to a premature closure of a fishery due to the “choke” situation.²⁸ This part of the CJEU ruling overturned the Opinion by Advocate General Ćapeta,²⁹ that the CFP’s 2020 MSY deadline applies to all stocks, without exception, i.e. including stocks primarily caught as bycatch.³⁰

Importantly, **the failure so far to prioritise the rapid recovery of depleted and struggling fish populations only perpetuates their dire state and traps fisheries in an undesirable situation that is eternally overshadowed by “choke” risks.** This approach fuels a vicious cycle of overfishing already

international level, below which specific and appropriate management action is to be taken to ensure that exploitation rates in combination with natural variations rebuild stocks above levels capable of producing MSY in the long term.” The equivalent provision in the [Western Mediterranean MAP](#) refers to B_{pa} rather than $MSY_{B_{trigger}}$. Regulation (EU) 2019/1022 of the European Parliament and of the Council of 20 June 2019 establishing a multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea and amending Regulation (EU) No 508/2014.

²⁰ UNCLOS (1982). [United Nations Convention on the Law of the Sea](#).

²¹ UN, [Agreement for the Implementation of the Provisions of the United Nations Convention on the Law of the Sea](#) of 10 December 1982 relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks.

²² <https://sustainabledevelopment.un.org/sdg14>.

²³ For example, the MSFD implementation report produced by the European Commission in 2020 concludes that “Biodiversity loss was not halted in Europe’s seas during the first MSFD cycle” and that “The biodiversity of marine ecosystems is still vulnerable in Europe’s seas and the good state of habitats and species is not secured.” [COM\(2020\) 259 final](#), REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC), p. 16.

²⁴ Office for Environmental Protection (2023). [Progress in improving the natural environment in England, 2021/2022](#). 19 January 2023. Full report available [here](#). For example, the report concluded that the “Government’s progress on delivery of its 25 year plan to improve the environment has ‘fallen far short’”,⁸ with 14 of 23 assessed environmental targets found to be “off track, in some cases significantly so”. This includes a failure to achieve or maintain marine GES by 31 December 2020. See pp. 10 and 31.

²⁵ Department for Environment, Food and Rural Affairs (2019). [Marine Strategy Part One: UK updated assessment and Good Environmental Status](#). October 2019.

²⁶ The term “choke” refers to a situation where no quota is available for one or more “choke” stocks, even though quotas for other more abundant stocks caught together in the mix have not been fully exhausted yet. Setting and respecting TACs set based on the scientific advice for “choke” stocks (which are often depleted and subject to zero-catch advice) can thus “choke” mixed fisheries that target more abundant stocks while also catching the unwanted “choke” species as bycatch. The term “choking” in this context means that fishers have to stop fishing, even though they still have quota for some of the stocks they are catching.

²⁷ The requirement that “the maximum sustainable yield exploitation rate shall be achieved [...] at the latest by 2020 for all stocks” in Article 2(2) of the CFP Basic Regulation.

²⁸ [Judgement of 11 January 2024, Case C-330/22 Friends of the Irish Environment v. The Minister for Agriculture, Food and Marine, Ireland and the Attorney General](#), ECLI:EU:C:2024:19. See for example paragraph 75.

²⁹ Case C-330/22 Friends of the Irish Environment CLG v Minister for Agriculture, Food and the Marine, Ireland, Attorney General EU:C:2023:487. <https://curia.europa.eu/juris/documents.jsf?num=C-330/22>. [OPINION OF ADVOCATE GENERAL ĆAPETA](#) delivered on 15 June 2023.

³⁰ *Ibid.*, paragraphs 30, 31 and 42. She considered that “by setting a fixed deadline, the EU legislature aimed to prevent the Council from putting short-term economic interests before the overarching long-term goal of progressively restoring and maintaining populations of fish stock above biomass levels capable of producing MSY”. She further argued that “Article 2(2) of the CFP Basic Regulation binds the Council in two ways. First, the MSY goal cannot be circumvented after the year 2020 (a). Second, that goal concerns all stocks, without distinction, whether or not in certain fishing operations they are referred to as ‘target stock’ or as ‘by-catch’ (b)”, and ultimately concluded that “the CFP Basic Regulation did not leave any discretion to the Council to depart from the MSY obligation in relation to by-catch when setting fishing opportunities in mixed fisheries”.

depleted stocks to avoid short-term quota cuts or closures, preventing stock recovery and gambling away ocean health and a productive future for fisheries and coastal communities in the long-term.

Importantly, regardless of the CJEU ruling on the Council's discretion in relation to the CFP's 2020 MSY deadline (regarding fishing pressure), this ruling in no way removed or loosened **the unambiguous obligation of the CFP's MSY objective to restore and maintain all stocks (without distinction between target and bycatch stocks) above biomass levels capable of producing the MSY, which is also included in the legally binding precautionary objective of the UK's Fisheries Act.**³¹ Yet, contrary to the EU's and UK's shared sustainability commitments, many stocks have been in a dire state for many years without effective rebuilding efforts (see Briefing 9). It is the responsibility of the Commission, the Council and individual Member States, in collaboration with third countries like the UK that the EU shares stocks with, to finally change that.³²

Blue Marine Foundation (BMF) took the UK government to court over a failure to implement sustainable fishing, specifically around unsustainable TAC-setting. The High Court dismissed BMF's judicial review,³³ but BMF is in the process of appealing the decision.³⁴

Deprioritising certain stocks, for example based on data limitations or bycatch issues, goes against the key principles of the CFP and UK Fisheries Act, in particular the MSY objective, which explicitly applies to all stocks, as well as the precautionary approach and the ecosystem-based approach which must underpin EU and UK fisheries management.

Despite a concerning attempt by the European Commission in 2023 to remove one of the few provisions in the EU's MAPs aimed at minimising the risk of population depletion through fishing,^{35,36,37} this safeguard remains in place. A legal case regarding unsustainable fishing limits in the Baltic Sea,³⁸ which at the time of writing this briefing series is still ongoing, may shed more light on what this important provision means for the setting of fishing opportunities going forward. Attempts to remove, rather than implement, such safeguards put at risk already depleted and struggling fish populations.

No thriving fisheries without ocean health, resilience and productivity

Too often past fisheries decisions to continue overfishing and delay or prevent recovery of fish populations have been taken based on the flawed justification that this is in the interest of fishers.³⁹ The opposite is the case. 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.

³¹ The "objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield" and to "aim to ensure that exploitation of marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield", in Article 2(2) of the CFP Basic Regulation. This is also a legal obligation established in Annex 2 of the 1995 UN Fish Stocks Agreement with respect to the management of straddling and highly migratory fish stocks.

³² A number of legal questions remain unanswered following the CJEU ruling, for example regarding the role of the ecosystem-based and precautionary approaches in TAC-setting (see Briefings 3 and 5) and the applicability of the CJEU's conclusions beyond the four bycatch TACs for 2020 in the focus of that ruling. Two further judgments were delivered on 25 June 2025 in the joined Cases [T-577/22](#) and [T-648/22](#) ClientEarth AISBL v Council of the European Union, dismissing the actions brought by ClientEarth regarding the 2022 TACs. At the point of writing this Briefing Series, we are still assessing whether these rulings provide further insights on the matter.

³³ Blue Marine Foundation (2025): [A High Court judge has dismissed Blue Marine Foundation's judicial review of the way the majority of fishing quotas are allocated](#). 28 March 2025.

³⁴ This refers to the time of writing of this Briefing Series, June 2025.

³⁵ COM(2023) 771 final. 6 December 2023. Fisheries - correction to multiannual plans (europa.eu): https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14057-Fisheries-correction-to-multiannual-plans_en.

³⁶ Stockholm University Baltic Sea Centre (2024). ANALYSIS: "Those are our rules, and if you don't like them, well, we'll make others". <https://www.su.se/stockholm-university-baltic-sea-centre/news/analysis-those-are-our-rules-and-if-you-don-t-like-them-well-we-ll-make-others-1.69732>.

³⁷ Joint NGO letter to (then-) Commissioner Sinkevičius regarding the Commission proposal to amend multiannual plans, 13 December 2023. <https://www.clientearth.org/latest/documents/call-to-european-commissioner-sinkevicius-preserve-eu-seas-from-overfishing-do-not-delete-the-last-remaining-safeguards/>.

³⁸ Coalition Clean Baltic (2024). Environmental organizations appeal to EU court to invalidate fishing quotas due to Baltic herring stocks collapse. 21 August 2024. <https://www.ccb.se/environmental-organizations-appeal-to-eu-court-to-invalidate-fishing-quotas-due-to-baltic-herring-stocks-collapse>.

³⁹ Regarding TAC-setting process in the EU, [Froese et al. 2025](#) (see footnote 5 for full reference) note "a strong bias for higher catches at every step, leading to TACs that often exceed what fishers are able to catch" and that "Shortsighted national interests and politics can dominate over sound scientific advice", "ultimately resulting in the systemic failure of implementing EBFM [ecosystem-based fisheries management] or even basic MSY management in the EU". They also state that "many fisher associations have not properly represented the mid- and long-term interests of their members in stable catches and high profits from healthy stocks in healthy seas" and that they instead "often exerted pressure on politicians, EU institutions, ICES and national institutes by calling for higher TACs".

Moreover, **the way that shares of the agreed fishing opportunities are allocated has enormous potential to either undermine or promote environmental as well as socio-economic sustainability.**⁴⁰

The current allocation of fishing opportunities - both in the EU and in the UK - is almost solely based on historic criteria: those fisheries who have historically caught certain amounts of fish in the past, are often granted similar quotas or fishing days also in subsequent years. This is despite a clear requirement in Article 17 of the CFP Basic Regulation and Section 25(3) of the UK Fisheries Act to incentivise the use of selective fishing gear and low impact fishing practices.⁴¹ This reinforces the impact of large-scale and industrial fisheries often using harmful fishing practices and enables the oligopoly of companies, at the expense of small-scale and low-impact fishers, fishing communities and fragile marine ecosystems. This paradox stresses the urgent need for a new approach to the allocation of fishing opportunities that favours fairness, sustainability, and the preservation of the ocean for future generations of fishers. This can be done by directing shares of fishing opportunities

- (1) towards low-impact parts of the fleet (i.e. those that avoid bycatch of non-targeted marine life and damage to the seabed) that are of greater importance to the local fishing community (e.g. in terms of employment opportunities and contribution to local economies); and
- (2) away from those with a high impact, questionable social and labour practices, and/or a history of non-compliance.

The EU and the UK share a responsibility to learn from past mistakes and finally put stock recovery and ocean health, the foundation for any fisheries-related livelihoods, at the heart of fisheries decisions (see Briefing 1). Setting fishing opportunities in line with exploitation levels that are not just sustainable from a single-stock perspective, but also future-proof fisheries by promoting ecosystem health (see Briefings 3 and 5), as well as applying and controlling the implementation of the Landing Obligation (see Briefing 8), are fundamental to sustainable fisheries management and must remain top priorities for decision-makers.

The UK Government stated its commitment to become a world leader in fisheries management by “*setting a gold standard*” following its departure from the EU,⁴² as well as continuing to uphold the vision of “*clean, healthy, safe, productive and biologically diverse seas*” set out in the UK’s Marine Strategy.⁴³ Similarly, the goal of the European Ocean Pact (EOP) to maintain a “*healthy, resilient and productive ocean*”,⁴⁴ a vision also endorsed by the 140+ organisations that signed the Blue Manifesto: Roadmap to a Healthy Ocean in 2030,⁴⁵ sets the right tone - but decisive action must now follow. **The annual TAC-setting cycle is a key opportunity for the EU and the UK, both jointly and individually, to finally put their various high-level commitments to sustainable fisheries into practice.**

⁴⁰ While the allocation of fishing opportunities is not part of the annual fisheries negotiations on the setting of fishing opportunities, sustainable fisheries management requires that fishing opportunities are both (1) set in a sustainable, precautionary and fully ecosystem-based way, and (2) allocated to fishers based on robust and transparent environmental criteria as outlined in this paragraph.

⁴¹ We are aware of Defra’s work undertaken on the UK side since 2023 in the context of the “Quota Application Mechanism” (QAM) trials. See for example this press release: Department for Environment, Food & Rural Affairs (2025). New trial awards quota to fishers delivering sustainability and growth, 2 April 2025. <https://www.gov.uk/government/news/new-trial-awards-quota-to-fishers-delivering-sustainability-and-growth>. We welcome this approach as a crucial first step towards aligning quota allocation with the requirements in Section 25(3) of the UK Fisheries Act. As part of this approach, Defra (and other relevant bodies) are assessing quota applications, based on social, environmental and economic criteria, the applicant’s plans to fish selectively and with lower impact, and have considered the applicant’s history of compliance. The strongest applications have been granted a share of additional quota for key commercial stocks. As of 2025, the trial only covers a small share of the “additional quota” the UK received through Brexit for some stocks and only applies to England. However, it offers a model for an improved quota allocation system that should now be scaled up, while addressing remaining questions and challenges to ensure that the QAM approach indeed delivers positive environmental, social and economic outcomes in line with Section 25(3) of the UK Fisheries Act.

⁴² Department for Environment, Food and Rural Affairs (DEFRA) (2018). [Fisheries white paper: Sustainable fisheries for future generations](#). 25 October 2018.

⁴³ Department for Environment, Food and Rural Affairs (DEFRA) (2019). [Marine Strategy Part One: UK updated assessment and Good Environmental Status](#). October 2019.

⁴⁴ This wording was used for example in the European Commission’s call for evidence to shape the EOP. 20 January 2025. https://oceans-and-fisheries.ec.europa.eu/en/news/shaping-european-oceans-pact-commission-launches-call-evidence-2025-01-20_en

⁴⁵ <https://seas-at-risk.org/blue-manifesto/>.



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.

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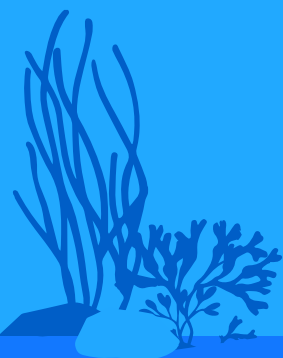
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ANNEX 1 - FULL REFERENCES TO ALL BRIEFINGS IN THIS SERIES

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/>

