

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



## Deep-sea stocks


Briefing 11 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](#)
- ◆ 8. [Landing obligation challenges](#)
- ◆ 9. [Depleted stocks with zero or very low catch advice](#)
- ◆ 10. [Stocks not managed by a Total Allowable Catch](#)
- ◆ 11. [Deep Sea stocks](#) (this briefing)

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

Deep-sea fish populations in European waters are either depleted or lacking information to assess their status. Their usually limited productivity and recovery capacity as well as the fragile ecosystems they inhabit make them exceptionally vulnerable to over-exploitation. Yet, EU and UK decision-makers have repeatedly set fishing opportunities above precautionary scientific advice, without successful efforts so far to fill data gaps that prevent full analytical stock assessments. This Briefing outlines a range of recommendations, some of which are covered in more detail throughout the rest of the Briefing Series, to recognize and factor in the particular vulnerability of deep-sea species and ecosystems, including:

- ◆ Setting fishing opportunities below the scientific single-stock advice (see [Briefing 1](#));
- ◆ Applying the precautionary approach and the ecosystem-based approach;
- ◆ Implementing and evaluating effective recovery measures;
- ◆ Improving data collection and addressing data gaps to improve stock assessments;
- ◆ Taking robust measures to protect Vulnerable Marine Ecosystems (VMEs); and
- ◆ Setting zero-catch TACs for deep-sea species that are recognised as vulnerable, threatened or endangered.

**Scientists indicate that deep-sea fish populations in European waters are either depleted or lacking information to assess their status.** Deep-sea fish tend to be slow-growing, late maturing and long-lived. The biological characteristics of most deep-sea species and the ecosystems they inhabit make them exceptionally vulnerable to over-exploitation and poorly adapted to sustained fishing pressure, whether targeted or not, since their productivity and recovery capacity are very limited. Deep-sea habitats themselves, including vulnerable marine ecosystems (VMEs), are highly susceptible to damage from deep-sea fishing - damage that can take centuries to recover from. Given these characteristics, deep-sea species and ecosystems should be managed with significant precaution, instead of being treated as by-products of target fisheries for other stocks and/or jeopardised as collateral damage. In this regard, much more needs to be done to protect deep-sea habitats to meet the obligations under the EU deep-sea fisheries Regulation 2016/2336, which is also part of Retained EU Law in the UK.

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<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.

**EU and UK fisheries ministers have repeatedly set fishing opportunities above the precautionary advice** provided by the International Council for the Exploration of the Sea (ICES) and the Scientific, Technical and Economic Committee for Fisheries (STECF), or even removed Total Allowable Catches (TACs) for many of these vulnerable stocks, **without successful efforts to date to fill the data gaps that still prevent full Maximum Sustainable Yield (MSY)-based stock assessments for many deep-sea species. This is contrary to the sustainability requirements of the Common Fisheries Policy (CFP) and the UK Fisheries Act**, including the precautionary approach, which requires more caution when data are lacking or uncertain, and the ecosystem-based approach of minimising negative impacts of fishing activities on the marine ecosystem (also see Briefings 2 and 5).

**It also fails to deliver on the EU's and UK's international commitments to manage deep-sea fisheries in a manner consistent with the global standard established by the United Nations General Assembly (UNGA).**<sup>3</sup> This standard commits the EU and UK to manage deep-sea fisheries to, amongst other things: end overfishing of deep-sea species; rebuild depleted stocks; prevent by-catch of vulnerable species; take into account the potential impacts of climate change and ocean acidification in taking measures to manage deep-sea fisheries and protect VMEs; and to protect VMEs, including all species associated with VMEs, from the adverse impacts of bottom fisheries whether they target deep-sea species or take them as bycatch.

To safeguard deep-sea stocks in the context of setting fishing opportunities, we provide the following recommendations.

## Recommendations for deep-sea stocks

Many of the recommendations covered in more detail throughout Briefings 1 to 10 in this Briefing Series directly apply to deep-sea stocks, particularly regarding the following:

- ♦ The setting of fishing opportunities below the ICES and STECF scientific single-stock advice where this does not yet fully reflect ecosystem needs and dynamics and/or is not explicitly geared towards rapid recovery above sustainable population levels (also see Briefings 1, 3 and 5);
- ♦ The application of the precautionary approach and the ecosystem-based approach to fisheries management and the need to prioritise the protection and recovery of vulnerable and/or depleted deep-sea stocks (also see Briefings 2, 5 and 9);
- ♦ The concerns around potential TAC removal or freezing of fishing effort and the need for the implementation and evaluation of effective recovery measures to ensure the CFP's and UK Fisheries Act's objectives are met (also see Briefing 10); and
- ♦ The need to urgently improve data collection and address current data gaps in order to enable the definition of MSY reference points or suitable proxies (to support rebuilding above levels which can produce MSY as required by the UN Fish Stocks Agreement) for the stocks concerned.

In addition to the above, recognising the particular vulnerability of deep-sea species and ecosystems, we recommend that the EU as well as the UK Government and devolved administrations:

- ♦ Support the effective implementation of the EU's Implementing Regulation (EU) 2022/1614 establishing a list of areas closures where VMEs are known or likely to occur, as well as the effective implementation of the EU deep-sea fisheries Regulation (EU) 2016/2336<sup>4</sup> (which is part of Retained EU Law in the UK), while considering a similar approach in UK waters;

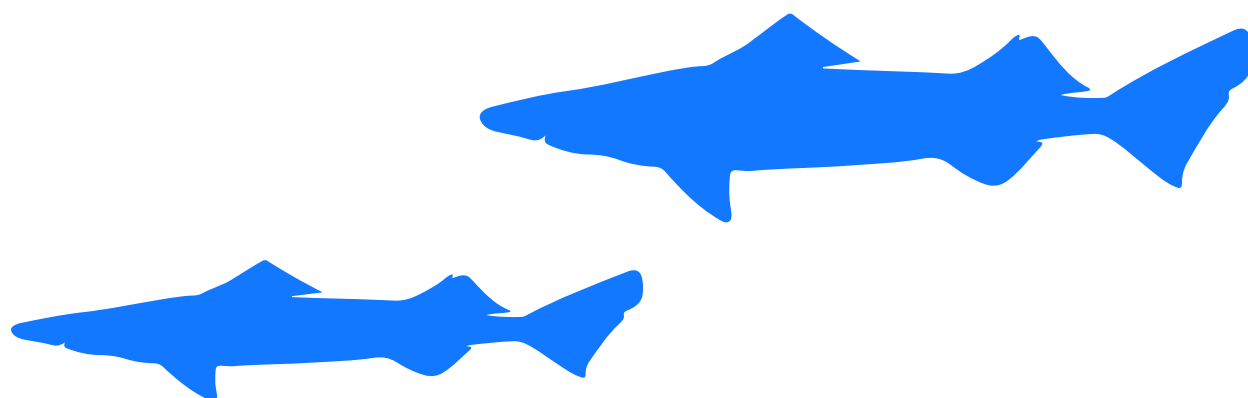
<sup>3</sup> Resolutions 61/105, 64/72, 66/68, 71/123 and 77/118 adopted by the General Assembly of the United Nations.

<sup>4</sup> Regulation (EU) 2016/2336 of 14 December 2016 establishing specific conditions for fishing for deep-sea stocks in the north-east Atlantic and provisions for fishing in international waters of the north-east Atlantic and repealing Council Regulation (EC) No 2347/2002.  
[https://oceans-and-fisheries.ec.europa.eu/news/fisheries-eu-moves-one-step-closer-protecting-deep-sea-ecosystems-bottom-fishing-its-waters-2022-06-28\\_en](https://oceans-and-fisheries.ec.europa.eu/news/fisheries-eu-moves-one-step-closer-protecting-deep-sea-ecosystems-bottom-fishing-its-waters-2022-06-28_en)

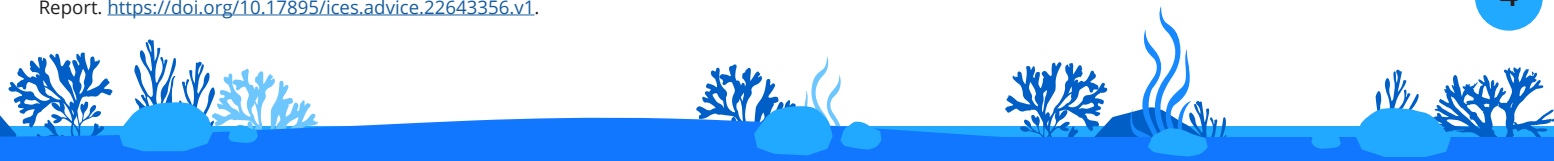
- ◆ Ensure that the European Commission and Member States conduct the next review of the list of areas where VMEs are known to occur or are likely to occur, as soon as possible as required by the EU deep-sea fishing Regulation, and implement comprehensive protection of VMEs in EU waters, including seamounts;<sup>5</sup>
- ◆ Set zero TACs for deep-sea species that are recognised as vulnerable, threatened or endangered, such as roundnose grenadier which is listed as Critically Endangered in the North Atlantic on the IUCN Red List; and at NEAFC the UK and the EU should support a zero TAC for both roundnose grenadier and continue to support zero TACs for orange roughy and deep-sea sharks, rays and chimeras;
- ◆ Set bycatch quotas at zero for any deep-sea species recognised as vulnerable, threatened or endangered, including deep-sea sharks, and implement effective mandatory bycatch mitigation measures for deep-sea sharks.

The EU and the UK have repeatedly committed to protect deep-sea ecosystems and biodiversity and to sustainably manage deep-sea fisheries through a series of resolutions adopted by the UN General Assembly since 2004. These resolutions in turn are grounded in the conservation, sustainability and precautionary approach obligations established in the 1995 UN Fish Stocks Agreement to which the EU and the UK are bound. The effective implementation of these commitments and legal obligations through managing deep-sea fisheries to prevent adverse impacts on vulnerable marine ecosystems and biodiversity is both critical to bringing these fisheries into compliance with international law but also to meet the obligations contained in the BBNJ Agreement as it nears entry into force.

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>5</sup> ICES (2023). Advice on areas where Vulnerable Marine Ecosystems (VMEs) are known to occur or are likely to occur in EU waters. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.22643356.v1>.



## CONTACT DETAILS

The below contact details refer to the main contacts for each of the organisations supporting this Briefing Series, and are not Briefing-specific.<sup>6</sup> We can help redirect any queries to the most appropriate colleagues for each individual Briefing.

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<sup>6</sup> Deutsche Umwelthilfe (DUH) supports the overall Briefing Series, but has asked that their logo and contact details not be included in this particular Briefing, as they do not work specifically on deep-sea fisheries.



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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.

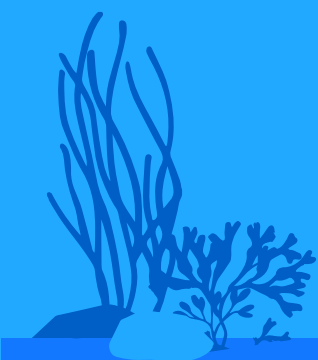
**Briefing 1:** Cover briefing: Key recommendations on setting fishing opportunities. Briefing 1 of 11 in the Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities”. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-on-fishing-opportunities-briefing-1-cover-briefing-key-recommen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

