

Mr Costas Kadis  
European Commissioner for Fisheries and Oceans  
European Commission<sup>1</sup>

28 August 2025

**Subject: Set sustainable, ecosystem-based fishing opportunities for 2026**

Dear Commissioner Kadis,

We write to you regarding the negotiations on the setting of fishing limits for 2026, which will shape the future of fisheries for years to come. Once the Baltic Sea negotiations have concluded, 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. The Commission will also propose fishing limits for EU-only stocks and fishing effort restrictions in the Mediterranean and Black Seas.

**We urge you to set and reach a clear objective for these negotiations: to ensure the recovery and significantly improve the state of fish populations. This is a key step towards achieving the European Ocean Pact's goal of maintaining a “*healthy, resilient and productive ocean*” that can support thriving, sustainable fisheries and coastal communities in the long-term.<sup>2</sup> This means setting precautionary fishing opportunities well below the best available scientific advice for maximum catches and target fishing mortality.<sup>3</sup> Doing so would finally end overfishing, boost stock recovery and maximise long-term ecosystem health, productivity and resilience in the face of mounting pressures like climate change.<sup>4</sup>**

Science-based management is a cornerstone not only of the fisheries chapter of the EU-UK Trade and Cooperation Agreement but is also key to the EU's Common Fisheries Policy and the UK's Fisheries Act. Numerous international agreements, including the United Nations Fish Stocks Agreement, the Convention on Biological Diversity and UN Sustainable Development Goal 14, all required fishing sustainably by 2020. Both the EU and the UK have missed this deadline and simultaneously failed to meet their legal obligation to achieve Good Environmental Status (GES) by the very same year.

**The scientific advice used to inform fishing opportunities, including catch limits and fishing effort restrictions, does not fully reflect all the relevant legal requirements and policy objectives, and is therefore not fit for purpose:** it is not fully recovery-focused, sufficiently precautionary or designed to fully account for and safeguard ecosystem integrity and

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<sup>1</sup> An equivalent letter including the same recommendations for fishing limits in the Northeast Atlantic has been sent to the UK Minister of State for Environment, Food and Rural Affairs, excluding references to fisheries management in the Mediterranean. The attached [joint Briefing Series](#) with our recommendations have also been sent to the Danish Council Presidency.

<sup>2</sup> This wording was used for example in the [European Commission's call for evidence to shape the EOP](#). 20 January 2025.

<sup>3</sup> Advice on catch limits for most Northeast Atlantic stocks is provided by ICES, whereas STECF provides advice for the Mediterranean, including regarding target fishing mortality under the [western Mediterranean multi-annual plan](#).

<sup>4</sup> See our [joint Briefing Series](#), and particularly the [Cover Briefing](#), with recommendations to the EU and the UK on fishing opportunities.

dynamics.<sup>5</sup> Setting fishing opportunities at best at, but often still above and rarely below this advice, jeopardises long-term population and ocean health, as well as the livelihoods that depend on it.

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 and fail to apply the necessary precaution in the face of ecosystem-related uncertainty and knowledge gaps.** Both parties claim leadership on tackling the biodiversity and climate crises, yet unsustainable exploitation of fish populations seriously undermines these claims. Moreover, the routine setting of fishing limits above scientific advice - advice which in itself is not designed to deliver GES - contributes to the EU's continued failure to achieve GES.

**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.** Long-term and widespread socio-economic losses will outweigh short-term and private profits if the EU and the UK continue to set fishing opportunities above scientific advice and fail to account for ecosystem dynamics and vulnerability and to safeguard ecosystem functioning.

**As Commissioner, you have the power and the responsibility to put the EU on a path towards truly sustainable, recovery-focused and ecosystem-based fisheries.** Your proposals can set the tone for this year's negotiations and remind negotiation partners of the benefits of investing in stock and ecosystem health, and the costs - both environmental and socio-economic - of failing to do so.

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

- **Proposing and setting catch limits well below the best available scientific single-stock advice for maximum catches** provided by the International Council for the Exploration of the Sea (ICES), as in most instances 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.<sup>6</sup>
- **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 the level where reproductive capacity may be reduced.<sup>7</sup>

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<sup>5</sup> See [Briefing 3](#) in our [joint Briefing Series](#) on shortcomings in the scientific advice on fishing opportunities and [this joint letter](#) to you on the same topic.

<sup>6</sup> See the [Cover Briefing](#) and [Briefing 3](#) of our [joint Briefing Series](#) for detailed explanations and recommendations.

<sup>7</sup> 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 scientific single-stock advice on fishing opportunities and the EU's and UK's requests for it, and committing to work with ICES to develop a clear roadmap for how these shortcomings will be swiftly addressed.**<sup>8</sup> For bilaterally shared stocks between the EU and UK, such a commitment should be included in the agreed written record for the negotiations.
- **Ensuring that Member States fully implement the western Mediterranean multiannual plan (West Med MAP),** by adopting the legally-mandated safeguard measures for fish populations outside precautionary limits, as well as fishing effort restrictions below scientific advice for maximum fishing days. The European Commission should also propose better-designed technical measures to reduce juvenile bycatch, and consider the potential addition of new gears, species and catch limits. This is crucial to tackle high fishing mortality and avoid further delays in meeting MSY exploitation rates beyond the 2025 deadline.<sup>9</sup>
- **Applying a precautionary and ecosystem-based approach when setting fishing opportunities, with special attention to mixed fisheries and interspecies dynamics.** This means setting fishing opportunities in the Northeast Atlantic, North Sea and the Baltic Sea below the ICES single-stock advice, and in the Mediterranean in line with bringing fishing mortality below the target fishing mortality from the Scientific, Technical and Economic Committee for Fisheries (STECF) 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, while urgently developing and implementing effective rebuilding plans for all stocks that are below sustainable levels;<sup>10</sup> and
  - (b) 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. Urgently commissioning the science needed to better account for these needs and supporting the UK and Scottish sandeel fishing closures will be key to safeguarding ecosystem health.<sup>11</sup>
- **Ensuring Member States implement effective measures to eliminate bycatch and discards, increasing selectivity, incentivise low impact fishing through quota allocation based on environmental and social criteria, and diligently control 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 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

<sup>8</sup> See [Briefing 3](#) in our [joint Briefing Series](#).

<sup>9</sup> 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](#).

<sup>10</sup> See [Briefings 6](#) and [9](#) in our [joint Briefing Series](#).

<sup>11</sup> See [Briefings 3](#) and [5](#) in our [joint Briefing Series](#).

Environmental Matters, by fully documenting and publishing information on negotiations, including initial positions.

We thank you for your time and consideration. We hope to see significant progress in ending overfishing, as well as a transition to fully sustainable, climate-smart and transparent fisheries that allow ecosystems, fishers and coastal communities to thrive in the long-term.

Please find attached the Cover Briefing of our [joint Briefing Series](#) which contain our specific recommendations. We look forward to meeting you and your departments to discuss them in detail.

Yours sincerely,

*Vera Coelho*

Vera Coelho  
Deputy Vice President, Oceana in Europe

On behalf of:

