ClientEarth's contribution to the European Commission's consultation on fishing opportunities for 2027

Context

ClientEarth submitted its contribution to the European Commission's annual consultation on fishing opportunities on 27 August 2026, with the "Joint Briefing Series Recommendations to the EU and the UK on fishing opportunities" attached. The contribution is logged here under Feedback reference "F33566693".

Text as submitted via the consultation website

The setting of fishing opportunities for 2027 will shape the future of fisheries for years to come. Despite positive trends in some areas, the European Commission itself recently recognised in its Common Fisheries Policy (CFP) evaluation report that progress on stock rebuilding is lacking and the number of stocks "*threatened by collapse due to impaired recruitment has increased during the reporting period*" (https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2026)120&lang=en p. 28).

The core objective for the Commission's proposals on fishing opportunities and the EU's position in this year's fisheries negotiations therefore has to be to ensure and consolidate the recovery of fish populations and safeguard them against unsustainable declines. 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 communities in the long-term.

A group of almost 30 organisations across the EU and the UK and all sea basins, including environmental NGOs, recreational fishers and fishing rights owners, developed a comprehensive joint Briefing series on the setting of fishing opportunities (https://www.clientearth.org/latest/press-office/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/ and attached). This series is designed to assist the responsible decision-makers in the EU (the 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.

This Briefing Series remains valid and as our contribution to the Commission's consultation we call on the Commission to follow all recommendations across all 11 briefings in the development of its proposals and its negotiations within the EU and with third parties. The series covers (1) key recommendations, (2) context and legal framework, (3) shortcomings in the current scientific advice, (4) shared fish stocks, (5) 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 TAC and (11) deep-sea stocks.

Importantly, fully recovery-focused, precautionary and ecosystem-based scientific advice is needed to form the bedrock of a healthy, resilient and productive ocean that can support thriving, sustainable fisheries and coastal communities. However, the current advice provided by the International Council for the Exploration of the Sea (ICES) on fishing opportunities – and fishery managers' requests that guide the provision of such advice – do not fully reflect all relevant EU and UK legal requirements and policy objectives.

Our core recommendation therefore remains that, until fundamental shortcomings in the "best available scientific advice" on fishing opportunities and in decision-makers' requests for such advice have been fully addressed (see Briefing 3, from p. 24 of the attached pdf), fishing opportunities should be set well below the scientific single-stock advice, fully in line with the legally required precautionary principle and ecosystem-based approach. For further explanations and details please refer to the Briefing Series (attached).

As for the Baltic Sea in particular which remains in a dire state, we urge you to follow the joint NGO recommendations on Baltic Sea fishing opportunities for 2027 (https://www.wwfbaltic.org/newsroom/marine/joint-ngo-recommendations-on-baltic-sea-fishing-opportunities-for-2027).