

The Rt Hon Steve Reed OBE MP  
Secretary of State for Environment, Food and Rural Affairs  
UK Government<sup>1</sup>

Cc Daniel Zeichner,  
Minister for Food Security and Rural Affairs

12 September 2024

**Subject: Setting Sustainable, Ecosystem-based Fishing Limits For 2025**

Dear Secretary of State,

We write ahead of the negotiations between the EU and the UK on fishing limits for 2025, which will have consequences for fisheries for years to come. 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. **We urge you to set and reach a clear objective for these negotiations: to significantly improve the state of shared fish populations, as a key investment in a healthy ocean that can support thriving, sustainable fisheries and coastal communities in the long-term. This means setting precautionary fishing limits well below the best available scientific advice for maximum catches, in order to finally end overfishing and maximise long-term ecosystem health, productivity and resilience in the face of mounting pressures like climate change.**

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, a deadline missed both by the EU and the UK. Meanwhile, the current scientific advice used to inform fishing limits is not designed to fully account for and safeguard ecosystem integrity and dynamics. Therefore, the habit of setting fishing limits at best at, but often still above and rarely below this advice, jeopardises long-term population and ocean health, eroding the foundations of thriving fisheries for generations to come.

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 we all face, but unsustainable exploitation of fish populations seriously undermines the credibility of such claims. Less than half of the 2024 catch limits involving the UK,<sup>2</sup> mostly referring to stocks shared with

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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 Executive Vice-President for Commissioner for the European Green Deal, Interinstitutional Relations and Foresight who is currently leading the fisheries portfolio, including EU-specific references to fisheries management in the Mediterranean.

<sup>2</sup> 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.

the EU, followed scientific advice, and 30% of fully assessed stocks are still overfished in the Northeast Atlantic.<sup>3</sup>

**Productive and resilient fisheries depend on a healthy environment.** Overfishing and destructive practices have been the main cause of marine biodiversity loss for the last 40 years and they critically undermine the resilience of fish and other wildlife to the impacts of climate change and their capacity to mitigate it.<sup>4</sup> Long-term and widespread socio-economic losses will outweigh short-term and private profits if the EU and the UK continue to set catch limits above scientific advice and fail to account for ecosystem dynamics, functioning and vulnerability.

**In the face of accelerating threats from the twin nature and climate emergencies, there is no more time to lose. We therefore urge you to finally deliver on your commitments and future-proof UK and EU fisheries by:**

- **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), where this does not yet fully reflect and safeguard ecosystem integrity and dynamics and/or is not explicitly geared towards rapid recovery above sustainable population levels. This is crucial in order to maximise long-term population and ecosystem health, productivity, resilience and capacity to mitigate climate change, and to account for discarding. This applies regardless of whether the advice is based on Maximum Sustainable Yield (MSY) or on the data-limited precautionary approach.
- **Applying a precautionary and ecosystem-based approach when setting catch limits, with special attention to mixed fisheries and interspecies dynamics.** This means setting catch limits below the ICES single-stock 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; 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. The science needed to better account for these needs must be urgently commissioned, and upholding the recent decision to close sandeel fishing in UK waters will be key to safeguarding ecosystem health.
- **Eliminating bycatch and discards, increasing selectivity, incentivising low impact fishing through quota allocation based on environmental and social criteria and diligently controlling fisheries** by using remote electronic monitoring (REM) with cameras, supported by onboard observer coverage as appropriate, to record where fishing occurs and what is caught. Full catch documentation and accounting for discards and

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<sup>3</sup> European Commission, Joint Research Centre, Scientific Technical and Economic Committee for Fisheries (STECF) Monitoring the Performance of the Common Fisheries Policy (STECF-Adhoc-24-01), Gras, M., Pierucci, A., Mantopoulou Palouka, D., Kupschus, S. and Konrad, C. editor(s), Publications Office of the European Union, Luxembourg, 2024, <https://data.europa.eu/doi/10.2760/547228>, JRC137731., e.g. Tables 3 and 4, p. 31, with 25 out of 83 assessed stocks still fished unsustainably in 2022.

<sup>4</sup> IPCC. 2019. [Special Report on the Ocean and Cryosphere in a Changing Climate](#). IPBES. 2019 [Global Assessment Report on Biodiversity and Ecosystem Services](#).

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

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

Please find our specific recommendations attached. We look forward to meeting you and your departments to discuss them in detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hugo Tagholm', with a stylized flourish at the end.

Hugo Tagholm  
Executive Director and Vice President, Oceana UK

On behalf of:

Angling Trust, Bass Angling Conservation, BirdLife Europe, BirdWatch Ireland, BLOOM Association, Blue Marine Foundation, ClientEarth, Deep Sea Conservation Coalition, Deutsche Umwelthilfe e.V. (DUH), Dutch Elasmobranch Society, Ecologistas en Acción, FishSec, France Nature Environnement (FNE), Friends of the Irish Environment, German Foundation for Marine Conservation (DSM), Marine Conservation Society, Northern Ireland Marine Task Force (NIMTF), North Sea Foundation, Oceana, Open Seas, Royal Society for the Protection of Birds (RSPB), Sciaena, Seas At Risk, Shark Trust, Whale and Dolphin Conservation, Wildlife and Countryside Link



Wildlife and  
Countryside

