

Mr Jacob Jensen
Minister of Food, Agriculture and Fisheries
Denmark¹

29 August 2025

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

Dear Minister Jensen,

Like every busy autumn, soon you will be back at the negotiation table in the Agrifish Council meetings and in third country negotiations with the UK and other coastal states to decide on fishing limits for the coming year. As the Council Presidency, you will play a key role in overseeing and leading this year's Agrifish discussions.

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.² This means setting precautionary fishing opportunities well below the best available scientific advice on maximum catches and target fishing mortality.³ 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.⁴

Despite the overall reduction in overfishing brought about by the Common Fisheries Policy (CFP) in the last decade, the EU still failed to fulfil its legal obligation to end overfishing in all its waters and missed the deadline to harvest all stocks sustainably by 2020, with many fishing limits still set above scientific advice.⁵ Additionally, both the EU and the UK have also 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 dynamics.⁶ **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.**

¹ A similar letter as well as the attached [joint Briefing Series](#) with our recommendations have also been sent to the European Commissioner for Fisheries and Oceans, whereas a UK version of the recommendations has been sent to the UK Minister of State for Environment, Food and Rural Affairs, excluding references to fisheries management in the Mediterranean.

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

³ 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](#).

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

⁵ ClientEarth (2024). [Taking stock 2024 - are TACs set to achieve MSY?](#) November 2024.

⁶ 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.

In October, you will set EU fishing opportunities in the Baltic Sea, where overfished populations are not improving, and the cod crisis continues.⁷ In the meantime, the consultations with the UK will resume with a view to establishing over 70 catch limits for shared stocks, most of which still exceeded scientific advice last year.⁸ Those shared with Norway and other coastal states will follow shortly, with comprehensive sharing arrangements for key pelagic stocks like mackerel - which shows a sharp increase in fishing pressure and decrease in stock size⁹ - still lacking. In December, you will finalise decisions for the Northeast Atlantic as well as the Mediterranean and Black Seas, where 21% and 52% respectively of assessed stocks continue to be subject to overfishing.¹⁰ The dire state of the critically endangered European eel¹¹ also continues to be a key issue for discussion. 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. 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.¹² Long-term and widespread socio-economic losses will outweigh short-term and private profits if the EU and its negotiation partners continue to set fishing opportunities above scientific advice and fail to account for ecosystem dynamics and vulnerability and to safeguard ecosystem functioning.

As the Council Presidency, you have the power and the responsibility to work with the Council and the European Commission to put the EU on a path towards truly sustainable, recovery-focused and ecosystem-based fisheries. This includes reminding other Member State representatives 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 change emergencies, we urge you to deliver on your commitments and future-proof 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), as in most instances, this advice does not yet fully reflect and safeguard

⁷ Please see specific [Joint NGO recommendations on Baltic Sea fishing opportunities for 2026](#). 17 June 2025.

⁸ Gilmour, F., Bell, E., O'Brien, CM. 2025. [Assessing the sustainability of negotiated fisheries catch limits by the UK for 2025](#). Cefas project report for Defra. 32pp.

⁹ ICES (2024). Mackerel (*Scomber scombrus*) in subareas 1–8 and 14 and Division 9.a (the Northeast Atlantic and adjacent waters). ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.25019339.v1>.

¹⁰ 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 Based on Tables 3 and 4, p. 43, 18 out of 84 assessed stocks were still fished unsustainably in 2023. For the Mediterranean: Figure 20, p. 63, with 34 out of 66 stocks still fished unsustainably in 2022, the most recent year with the relevant data.

¹¹ ICES (2024). European eel (*Anguilla anguilla*) throughout its natural range. ICES Advice: Recurrent Advice. Report. <https://doi.org/10.17895/ices.advice.27100516.v1>.

¹² IPCC. 2019. [Special Report on the Ocean and Cryosphere in a Changing Climate](#). IPBES. 2019 [Global Assessment Report on Biodiversity and Ecosystem Services](#).

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.¹³

- **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 a level where reproductive capacity may be reduced.¹⁴
- **Recognising shortcomings in the scientific single-stock advice on fishing opportunities and the EU's and UK's requests for it, and supporting the European Commission in working with ICES to develop a clear roadmap for how these shortcomings will be swiftly addressed.**¹⁵ For bilaterally shared stocks between the EU and UK, a commitment to advancing such work should be included in the agreed written record for the negotiations.
- **Fully implementing 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. Member States should also agree on 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.¹⁶
- **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 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;¹⁷ and

¹³ See the [Cover Briefing](#) and [Briefing 3](#) of our [joint Briefing Series](#) for detailed explanations and recommendations.

¹⁴ 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](#).

¹⁵ See [Briefing 3](#) in our [joint Briefing Series](#).

¹⁶ 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](#).

¹⁷ See [Briefings 6](#) and [9](#) in our [joint Briefing Series](#).

(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.¹⁸

- **Eliminating bycatch and discards, increasing selectivity, incentivising low impact fishing through quota allocation based on environmental and social criteria, and diligently controlling 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 underreporting in a precautionary way is particularly crucial in fisheries with bycatch 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.

This autumn we count on you to lead the Council towards fisheries decisions that finally end overfishing and 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 contains our specific recommendations. We thank you for your consideration and look forward to meeting you and your services to discuss them in detail.

Yours sincerely,

Ester Asin,

Director WWF European Policy Office



On behalf of:

¹⁸ See [Briefings 3](#) and [5](#) in our [joint Briefing Series](#).

