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

Cover Briefing: Key recommendations on setting fishing opportunities

Briefing 1 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:[1,2]

- 1. Cover Briefing: Key recommendations on setting fishing opportunities (this briefing)
- 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

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

This Cover Briefing presents our key recommendations to EU and UK decision-makers across the wide range of topics covered in more detail throughout the rest of the Briefing Series. These recommendations cover both fish populations exploited by the EU or the UK alone, and those shared bilaterally or with third countries like Norway.

Our core recommendation is 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), fishing opportunities should be set well below the scientific single-stock advice. This Cover Briefing explains

- Why this approach is imperative to future-proof EU and UK fisheries;
- How it could be operationalised; and
- What other measures are needed alongside it, to secure stock recovery and safeguard ocean health, the foundation for any fisheries-related livelihoods.

Key recommendations on setting fishing opportunities

Persistent political decisions to set fishing opportunities above scientifically advised levels and with little regard to ecosystem impacts perpetuate overfishing of Baltic, Northeast Atlantic and Mediterranean fish populations, including vulnerable deep-sea species, and are a substantial roadblock preventing sustainable fisheries management. A continuation of this approach is not only at odds with EU and UK law, as well as international sustainability commitments, including the application of an ecosystem-based and precautionary approach (see Briefing 2); it also undermines the livelihoods of all those who depend on a healthy, resilient and productive ocean. Moreover, a failure to rebuild EU and UK fish populations weakens the EU's and the UK's respective food sovereignty and risks further increasing the dependence on imports - and exposure to unfair competition - from sources that are uncooperative,[3] and/or have a high risk of Illegal, Unreported and Unregulated (IUU) fishing.

We therefore call on the European Commission, the Council of EU fisheries ministers, the UK Government and devolved administrations to stop repeating past management mistakes and set fishing opportunities in a way that promotes a healthy ocean that can support thriving, sustainable fisheries and coastal communities, by:

1 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.
2 Cross-references will be included throughout the text using the relevant Briefing numbers. Full references to all Briefings are listed in ANNEX 1.
3 For example countries that do not participate in relevant sharing arrangements and management discussions for certain shared stocks they fish.

(1) **Ending overfishing**: fully applying the precautionary approach to fisheries management and ensure the full implementation of the Landing Obligation (LO), so that all catches are reliably documented and accounted for;

(2) **Restoring and maintaining fish populations above healthy and productive levels**: rapidly recovering depleted and struggling fish stocks and generally investing in larger, healthier, more resilient, and more productive fish populations; and

(3) **Fully applying the ecosystem-based approach to fisheries management**: explicitly factoring ecosystem integrity and dynamics into the setting of fishing opportunities and the scientific advice that underpins them and minimise incidental catches, to safeguard and boost ecosystem health, resilience and productivity.

The case for recovery-focused and ecosystem-based fishing opportunities

In light of the current biodiversity and climate crises, it is imperative to rebuild all stocks well above sustainable[4] and productive levels in order to enable them to cope with and mitigate mounting pressures. **We therefore strongly recommend investing in the resilience of populations and ecosystems by fishing well below the maximum catch level advised by the International Council of the Sea (ICES) in its single-stock advice, and the Scientific, Technical and Economic Committee on Fisheries (STECF) for the Mediterranean,**[5] rather than setting fishing opportunities at or even above this level (see Briefing 3 for further details).

There are plenty of reasons to follow our suggested approach, such as the need to:

a. maximise stock and ecosystem health and resilience in the face of climate change and other challenges,[6] including a projected increasing frequency of marine heatwaves;

b. maximise the potential of fish populations to contribute to effective oceanic carbon sequestration and to mitigate against climate change;[7]

c. factor in mortality from illegal and unreported discarding;[8]

d. minimise, and where possible reverse, impacts of fishing on ecosystems, e.g. by fully accounting for predator needs (including foraging fish species and other marine life like seabirds and cetaceans) and other ecosystem dynamics;[9]

e. safeguard and rebuild depleted or vulnerable fish populations in mixed fisheries;[10]

f. provide a buffer in case of unexpected unfavourable changes in the perception of the exploitation and status of fish populations and the underlying assessments;[11] and

g. facilitate long-term market stability and predictability by avoiding large fluctuations in TACs and corresponding catches between years.[12]

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4 We use the term "sustainable" throughout this Briefing Series to refer to population sizes above biomass levels capable of producing the MSY, as referenced in the legally binding objective in EU and UK legislation that "*exploitation restores and maintains populations of harvested species above*" such levels (see Briefing 2). We do not consider any biomass (or any fishing pressure that decreases or keeps stocks) below this level, i.e. below B_{MSY}, "sustainable".

5 While this Briefing focuses on ICES advice provided for NE Atlantic stocks, the same issues are relevant for the STECF advice provided for the Western Mediterranean. For detailed recommendations on fisheries management in the Western Mediterranean, please refer to Briefing 7.

6 See Briefing 5. Also see Sumaila, UR, de Fontaubert, C, Palomares, MLD (2023). Editorial: How overfishing handicaps resilience of marine resources under climate change. Front. Mar. Sci., 15 August 2023. Sec. Marine Fisheries, Aquaculture and Living Resources. Volume 10, 2023.

7 Saba, GK, Burd, AB, Dunne, JP, Hernández-León, S, Martin, AH, Rose, KA, Salisbury, J, Steinberg, DK, Trueman, CN, Wilson, RW, Wilson, SE (2021). Toward a better understanding of fish-based contribution to ocean carbon flux. Limnology and Oceanography, Volume 66, Issue 5, pp.1639-1664.

8 See Briefing 8.

9 See Briefing 5.

10 See Briefings 6 and 9.

11 West of Scotland whiting could serve as a positive example, for which the increase in catch advice from zero catch to 4114 t in 2022 was not immediately fully exhausted. Based on the ICES advice from 2024, the stock was estimated to be below MSY $B_{trigger}$ and projected to decrease further. Fully using the headline advice of 4114 t would have put the stock in a weaker position. ICES (2024). Whiting (Merlangius merlangus) in Division 6.a (West of Scotland). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019723.v1, Table 6, p. 4 and Figure 1, p. 1.

12 For example, Froese et al. (2025) highlight that "*as long as the stock size fluctuates above the legally required minimum level (B_{MSY}), the TAC can remain stable and close to MSY, giving a strong incentive for fishers to keep stocks large and healthy and providing the often-asked for planning security in the fishing industry*". Froese, R; Steiner, N; Papaioannou, E; MacNeil, L; Reusch, T B H; Scotti, M (2025). Systemic failure of European fisheries management. Science 388(6749), pp. 826-828. DOI: 10.1126/science.adv4341. May 2025.

A study published in Science in 2024, based on an investigation of 230 fisheries around the world, found that "*populations of many overfished species are in far worse condition than has been reported*",[13] showing that "*[c]urrent stock assessment models overestimate productivity and recovery trajectory*", particularly for overfished stocks.[14] Celtic Sea cod is one example of this phenomenon, where biomass increases for depleted stocks do not materialise as projected, and/or the stock situation in hindsight turns out to be worse than previously assumed.[15,16] The issue of such "phantom recoveries" has also been confirmed for example for Western Baltic cod, with biomass having repeatedly been overpredicted.[17] This further supports our recommendation to set fishing opportunities below scientific advice to mitigate the risk posed by potentially overly optimistic underlying stock assessments. **While this approach may require a decrease in certain fishing opportunities in the short-term, it is a key way of future-proofing EU and UK fisheries and maximising their sustainability, productivity and profitability in the long-term.**

Shortcomings in the scientific advice used to underpin fishing opportunities

Importantly, as explained in more detail in Briefing 3,[18] we are concerned that **the current ICES advice on fishing opportunities - and decision-makers' requests that guide the provision of such advice - do not fully reflect all relevant legal requirements and policy objectives applicable to the EU and the UK**. Specifically, they are not geared towards:

1. recovering fish populations within a concrete timeframe and maintaining them above sustainable levels in the near future;
2. preventing fish populations from, or minimising their risk of, falling outside safe biological limits, despite legal safeguards in the EU's Multi-Annual Plans (MAPs) which are also part of Retained EU Law in the UK; or
3. delivering on all relevant elements of "Good Environmental Status" (GES) under the Marine Strategy Framework Directive (MSFD) and the UK's Marine Strategy Regulations 2010, such as healthy population structures and/or food web integrity (e.g. leaving enough food in the sea for other marine life), in line with an ecosystem-based approach to fisheries management.

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13 Edgar, G (2024). Investigation reveals global fisheries are in far worse shape than we thought – and many have already collapsed. 23 August 2024. https://theconversation.com/investigation-reveals-global-fisheries-are-in-far-worse-shape-than-we-thought-and-many-have-already-collapsed-237306. The underlying study is: Edgar et al. (2024). Stock assessment models overstate sustainability of the world's fisheries. Science, 385(6711), pp. 860-865. https://www.science.org/doi/10.1126/science.adl6282.

14 Froese, R & Pauly, D (2024). Taking stock of global fisheries. Current stock assessment models overestimate productivity and recovery trajectory. Science, 385(6711), pp. 824-825. https://www.science.org/doi/10.1126/science.adr5487. This article highlights that, while "*hindsight historical last biomass estimates were more or less accurate for sustainably fished stocks*", "*[f]or stocks that were overfished, however, historical biomass estimates were substantially overestimated compared with more recent assessments*", and "*rising trends in biomass reported for overfished stocks were often inaccurate, resulting in so-called phantom recoveries for stocks where actual biomass was fluctuating at a low amount or even declining*". The paper concludes that the "*main reason for the overestimation of recent biomass is the tendency of standard models to overestimate productivity at depleted stock levels. That tendency is apparent at the low range of biomass (typically between 20 and 40% of maximum biomass) predicted as sufficient to support maximum sustainable catches*".

15 For example, the stock size estimates for Celtic Sea cod for the years 2015 to 2022 based on the more recent ICES advice from 2024 were consistently lower than the estimates from the advice provided two years earlier, in 2022. For example, the 2022 SSB estimate from the 2024 advice was only 835 t, compared to the 2022 SSB estimate of 1196 t from 2022 advice. This indicates that based on the more recent assessment this stock was actually in worse shape in 2022 than what was estimated at the time. Moreover, the forecast in the advice from 2022 projected the stock to increase by 101% to a 2024 SSB of 2120 t assuming a catch of 424 t in 2023 (based on the F_{MSY} catch scenario, which is the closest to the actual catch of 457 t later reported for 2023). However, based on the more recent 2024 advice, the stock instead actually decreased by 30% from 835 t in 2022 to an all-time low of 585 t in 2024 (which is 72% less than the 2120 t projected for 2024 two years before), indicating that the initial outlook from the assessment in 2022 was too optimistic. ICES (2024). Cod (Gadus morhua) in divisions 7.e-k (eastern English Channel and southern Celtic Seas). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019234.v1. ICES (2022). Cod (Gadus morhua) in divisions 7.e–k (western English Channel and southern Celtic Seas). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.19447898.v1, Table 9, SSB Value for 2022 in both advice sheets, and Table 2 in the advice from 2022. The 2023 catch of 457 t is based on the sum of the landings and discards specified for 2023 in Table 9 of the 2024 advice.

16 Also note that ICES found part of its "Advice Rule" which guides the production of ICES advice on fishing opportunities to not be precautionary for depleted stocks. It has proposed a way to address this, which still seems to be under discussion at the time of writing this briefing series.

17 Froese et al. (2025), see full reference in footnote 12. See figure on p. 827, showing "*examples of previous unrealistic estimates and forecasts made by ICES in 2015 and 2018 to 2021*".

18 Also see this joint letter to EU Commissioner Kadis regarding the 2024 renewal of the Specific Grant Agreement between ICES and DG MARE which guides the provision of scientific advice on fishing opportunities. 11 April 2025. https://www.clientearth.org/latest/documents/letter-to-european-commissioner-kadis-regarding-the-renewal-of-the-specific-grant-agreement-with-ices/.

This means that while the current ICES advisory framework indeed reflects the requirement to exploit fish populations at or below the maximum sustainable yield (MSY) exploitation rate (see Briefing 2)**, it is not designed to deliver rapid stock recovery, be sufficiently precautionary or safeguard ecosystem health.** For example, the current ICES Advice Rule used to produce the ICES "headline" advice[19] does not contain: a concrete recovery target or timeframe; a safeguard to prevent stocks from falling outside safe biological limits in the short- or mid-term; or any explicit ecological objectives.[20] Setting TACs at or - as is often still the case - even above such advised catch levels is not in line with: the MSY objective of the EU's Common Fisheries Policy (CFP); the UK Fisheries Act's precautionary objective of recovering and maintaining all stocks above levels capable of producing MSY; or the precautionary and ecosystem-based approach (see Briefing 2).

We call on the EU, the UK and other ICES advice clients to work with ICES to swiftly address the above concerns to ensure that future ICES advice fully safeguards ecosystem health and aims for rapid recovery above sustainable population levels with a healthy age/size structure.[21] Until this is the case, it is the decision-makers' responsibility to explicitly integrate the necessary additional precaution into fisheries decisions,[22] including TAC-setting. We provide recommendations below on how this additional precaution that isn't yet fully reflected in the headline advice itself, could be operationalised in a quantitative way based on the information presented in the ICES single-stock advice, pending fully recovery-focused and ecosystem-based advice becoming available.

The need for improved data collection, robust catch accounting and transparency

As for data-limited stocks, we welcome the work within ICES to further develop methods to provide quantitative advice using available information for example on life history traits and exploitation characteristics.[23] **We strongly recommend that remaining data gaps are explicitly identified on a stock-by-stock basis and that concrete roadmaps for what is needed to address them are developed and implemented as a matter of urgency**. Lifting stocks out of the data-poorest categories, where only landings information is available, is crucial to move on from the current situation where precautionary advice using a precautionary buffer is often criticised by industry and is exceeded on a regular basis. The examples of Celtic Sea pollack[24] and Irish Sea cod[25] which both moved from precautionary advice that was routinely exceeded to zero-catch advice based on the MSY approach (confirming their severely depleted state), should serve as a cautionary tale on the consequences of ignoring precautionary advice.

19 The ICES Advice Rule guides the provision of the "headline" advice at the top of the ICES advice sheet. For an explanation of the ICES Advice Rule for data-rich stocks, please refer to ICES (2023). Advice on fishing opportunities (2023). General ICES Advice guidelines. Report. https://doi.org/10.17895/ices.advice.22240624.v3. pp. 5-6.

20 See Briefing 3 for further details. Examples of stocks for which the ICES headline advice at the top of the advice sheet from 2024 was projected to keep, or allow stocks to fall, below MSY $B_{trigger}$ and/or B_{pa} (i.e. outside safe biological limits), even though catch options are available that would allow them to remain above this level or at least increase towards it, include West of Scotland whiting, North Sea sole and sea bass.

21 *Ibid*.. Also see for example this briefing by the Pew Charitable Trusts (2024): To Improve Fisheries Management and Protect Ecosystems, Decision Makers Must Ask Better Questions. February 2024. https://www.pewtrusts.org/-/media/assets/2024/02/to-improve-fisheries-management-and-protect.pdf.

22 This reference to "additional" precaution reflects what is already legally required and does not go beyond it. It refers to the common situation where this precaution (i.e. to ensure that the advised fishing levels are compatible with (1) restoring and maintaining stocks above levels capable of producing the MSY, (2) preventing stocks from falling outside safe biological limits and (3) safeguarding ecosystem health) is not fully reflected in the ICES headline advice itself, so that setting fishing limits at or above these levels is not sufficiently precautionary or ecosystem-based as legally required.

23 The ICES WKLIFE workshops have been developing quantitative assessment methodologies for data-limited stocks. See for example https://www.ices.dk/community/groups/Pages/WKLIFEX.aspx and https://www.ices.dk/community/groups/Pages/WKLIFEXI.aspx.

24 ICES (2023). Pollack (Pollachius pollachius) in subareas 6–7 (Celtic Seas and the English Channel). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.21841011.v1. This stock was subject to precautionary advice of 3360 t from 2019 to 2023 which was exceeded substantially in all years (the sum of the two relevant TACs was 12560 t in 2019, 12401 t in 2020, 9610 t in 2021, 8168 t in 2022 and 6535 t in 2023), see Table 6, p. 4. The ICES advice for 2025 confirms that the stock is at the lowest level ever recorded and has been below B_{lim} since 2016. ICES (2024). Pollack (Pollachius pollachius) in subareas 6-7 (Celtic Seas and the English Channel). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019477.v2

25 ICES (2022). Cod (Gadus morhua) in Division 7.a (Irish Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.19447895.v1. The stock was subject to precautionary advice between 2020 and 2022 which has been exceeded (TAC of 257 t versus advice of 116 t in 2020; 206 t vs. 93 t and 74 t in 2021 and 2022, respectively, see Table 6, p. 5). The ICES advice for 2025 confirms that the stock has been below B_{lim} since 2021. ICES (2024). Cod (Gadus morhua) in Division 7.a (Irish Sea). ICES Advice: Recurrent Advice. Report. https://doi.org/10.17895/ices.advice.25019231.v1.

Sustainable, ecosystem-based fishing opportunities must be underpinned by robust and comprehensive monitoring and enforcement to ensure that catches are fully documented and accounted for. The swift roll-out of remote electronic monitoring (REM) with cameras is essential in this context.

Finally, we reiterate that **the continued lack of transparency around key negotiation processes makes it difficult to unambiguously identify who has pushed for unsustainable fishing opportunities and on what basis**. This impedes civil society's ability to scrutinise the decisions made, allocate both credit and blame where they are due, and - ultimately - hold decision-makers accountable for decisions that are not in line with science or the law. The EU and the UK must therefore document and publish the relevant negotiating positions and records of negotiations.

We call on EU and UK decision-makers to follow our below key recommendations on the setting of fishing opportunities, to secure the future of a healthy ocean and all who depend on it.

Key recommendations for the setting of fishing opportunities

- **Set catch limits well <u>below</u> - and under no circumstances above - the best available scientific single-stock advice provided by ICES,[26] where this does not yet fully reflect and safeguard ecosystem integrity and dynamics and/or is not explicitly geared towards rapid recovery and/or maintaining populations above sustainable biomass levels**. This is necessary to maximise long-term population and ecosystem health and productivity, both for stocks with advice based on the ICES MSY approach and for stocks with advice based on the ICES precautionary approach for data-limited stocks. Importantly, the ICES headline advice presented at the top of the respective ICES single-stock advice document represents the maximum level of catches not to be exceeded from the single-stock perspective, rather than a target or absolute recommendation aimed at safeguarding ecosystem health and/or ensuring stock recovery. Indeed, TACs need to be set well <u>below</u> this headline advice in order to safeguard other stocks caught in the same fisheries and/or to factor in additional pressures or ecosystem dynamics (see below and Briefings 3, 5 and 6), where these aspects are not fully reflected in the headline advice. To operationalise this, the EU, the UK and other third parties with which they have fisheries agreements such as Norway could develop a quantitative precautionary approach to TAC-setting that can be used as a default in the absence of fully ecosystem-based, recovery-focused ICES advice and that involves setting TACs as follows:
    - *<u>For stocks below MSY $B_{trigger}$ and/or B_{pa} and/or B_{lim}</u>* (also see Briefing 9): at or below levels that aim for recovery within no more than twice the time needed for recovery in the absence of fishing (T_{MAX}/T_{MIN} <= 2, as suggested by ICES WKREBUILD2).[27] Where such bespoke rebuilding-focused advice is not available, a minimum increase in biomass should be targeted for the following year; the size of this increase could be based on a) the specific stock situation and b) available catch options together with their corresponding biomass projections.[28] Moreover, the EU, the UK and other relevant international negotiation partners should urgently develop and implement effective rebuilding plans and remedial

26 Similar to this recommendation, Froese et al. (2025) (see footnote 12 for full reference) state that "*it should be understood and accepted that the scientific estimate of the maximum catch that a stock can support given its ecosystem role and environmental conditions is a hard upper limit that is not open for political negotiation or compromise. Instead, political and societal discussions of allowed catch can focus on debating how far TACs shall be set below the scientific limit to account for uncertainty and to maximise resilience, minimize risks, and ensure long-term profitable fisheries.*"

27 ICES (2023). Workshop on guidelines and methods for the design and evaluation of rebuilding plans for category 1-2 stocks (WKREBUILD2). ICES Scientific Reports. Report. https://doi.org/10.17895/ices.pub.24763293.v2.

28 In the absence of ICES advice that is explicitly geared towards stock rebuilding over a particular timeframe, the EU and UK negotiation teams could review the available catch options in the ICES single-stock advice sheet, and for example base TACs on the scenario corresponding or closest to the mid-point between the biomass increase projected for zero catch and that for $F_{MSY\ lower}$ or $F_{MSY\ lower} \times SSB/MSY\ B_{trigger}$, (with "SSB" referring to the spawning stock biomass from the ICES-short-term forecast), or set them halfway between the corresponding catch options.

measures (reflecting the findings of WKREBUILD2) for all populations below MSY $B_{trigger}$ (see Briefing 9). These plans and measures could be linked to or incorporated into the relevant Fisheries Management Plans (FMPs) on the UK side, and Multi-Annual Plans (MAPs) on the EU side.

- *For stocks at or above MSY $B_{trigger}$ and/or which are below it but have catch options that allow for an increase above MSY $B_{trigger}$*: at or below levels that allow for population sizes to recover or be maintained at or above a certain percentage above the MSY $B_{trigger}$,[29] to build in a safeguard to buffer against climate change impacts and/or population fluctuations (also see Briefing 5).[30] For example, TAC-setting could be based on aiming for biomass levels of, as a minimum, 120%, 150% or 200% of the MSY $B_{trigger}$ or even more, depending on a) the specific stock situation; and b) available catch options and their corresponding biomass projections.[31]
- *For all stocks*: at a maximum of a certain fraction, such as 80% (or another, lower level, depending on the stock situation), of the ICES single-stock headline advice, to build in a precautionary safeguard in the face of uncertainty around ecosystem needs and dynamics.[32]

♦ **Work with ICES and other ICES advice clients to ensure that future requests for scientific advice on fishing opportunities are explicitly geared towards (1) rapid rebuilding of populations that are below sustainable biomass levels, (2) reaching and maintaining population levels well above B_{MSY} with a healthy age/size structure, and (3) fully accounting for and safeguarding ecosystem health and dynamics.**[33,34,35] These requests must also fully reflect EU, UK and international environmental legislation, including for example ecological objectives regarding GES under the EU's MSFD and the UK's Marine Strategy Regulations 2010. In the absence of such fully ecosystem-based and recovery-focused scientific advice, ICES advice

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29 As explained in more detail in Briefing 3, aiming to restore or maintain fish populations merely at or near MSY $B_{trigger}$ fails to meet the CFP's legally binding MSY Objective, and the UK Fisheries Act's precautionary objective, of restoring and maintaining all stocks above B_{MSY}. Where B_{MSY} is unknown, a proxy for it should therefore be used rather than defaulting to the use of MSY $B_{trigger}$. For example, a study by Froese et al. (2021), which "*Given that B_{pa} is a proxy for MSY $B_{trigger}$ [...] assumes an approximate relation between B_{pa} and B_{MSY} with B_{pa} = 0.5 B_{MSY}*", suggests that 200% of B_{pa} (or of MSY $B_{trigger}$, as this is often set at B_{pa}) could be used as a proxy for B_{MSY} to aim for in the absence of bespoke B_{MSY} estimates. Froese, R., Tsikliras, A. C., Scarcella, G., Gascuel, D. (2021). Progress towards ending overfishing in the Northeast Atlantic. Marine Policy 125 (2021) 104282. https://fishbase.de/rfroese/MarPol_EU_Fishing_2021.pdf. Similarly, another earlier study by Froese et al. (2014) had also confirmed based on analysis of stocks from other areas outside the Northeast Atlantic that "*twice SSB_{pa} provides a reasonable preliminary estimate*". Froese, R., Coro, G., Kleisener, K., Demirel, N. (2014). Revisiting safe biological limits in fisheries. Fish and Fisheries, Volume 17, Issue 1, p. 193-209. https://doi.org/10.1111/faf.12102.

30 For example, a study by Kemp *et al.* suggested that "*biomass of fish stocks should be allowed to regenerate to a minimum of 120% of that which will achieve MSY to provide a buffer against the uncertainty in ecological response to climate change*". Kemp, PS, Subbiah, G, Barnes, R, Border, K, O'Leary, BC, Stewart, B, Williams, C (2023). The future of marine fisheries management and conservation in the United Kingdom: Lessons learnt from over 100 years of biased policy. Marine Policy 147 (2023) 105075, https://doi.org/10.1016/j.marpol.2022.105075, p. 1 (abstract). Given that MSY $B_{trigger}$ constitutes only the lower boundary of biomass fluctuation around B_{MSY}, and is usually set at B_{pa} (the boundary between inside and outside safe biological limits), it seems appropriate to aim for a higher percentage than 120% above MSY $B_{trigger}$, where B_{MSY} is unknown. In combination with the potential use of 200% of the B_{pa} (or of the MSY $B_{trigger}$), this would suggest aiming for 1.2 * 200%, i.e. 240% of the B_{pa} (or of the MSY $B_{trigger}$).

31 The exact percentage above the MSY $B_{trigger}$ which can be achieved in the short-term will depend on the specific stock situation, e.g. how close to or far above MSY $B_{trigger}$ the stock in question is already, and what catch options and corresponding biomass projections are available in the ICES advice. In light of the legally binding obligation under the CFP's MSY Objective and the precautionary objective in the UK Fisheries Act to restore and maintain all stocks above B_{MSY}, TACs could be based for example on the scenario corresponding or closest to the mid-point between the biomass increase projected for F_{MSY} and for $F_{MSY\ lower}$ or $F_{MSY\ lower}$ × SSB/MSY $B_{trigger}$, (with "SSB" referring to the spawning stock biomass from the ICES-short-term forecast) for all stocks that are not yet at or above B_{MSY} or relevant proxies (such as 2 * B_{pa} or 2 * MSY $B_{trigger}$). For stocks already at or above such levels, TACs could be set based on at least keeping the biomass stable.

32 ICES uses a "precautionary buffer" of 20% as part of its approach to delivering precautionary single-stock advice for data-limited stocks. In the absence of quantitative ecosystem-based advice, the EU and UK could apply a similar percentage (by setting TACs 20% or more below the ICES single-stock headline advice, i.e. at 80% or less of it) where the latter does not demonstrably fully reflect ecosystem needs and dynamics. Other percentages could be applied if underpinned by bespoke stock-specific information.

33 For further context on this topic, please refer to Briefing 3 and this joint letter co-signed by 17 organisations and sent to EU Commissioner Kadis on 11 April 2025 regarding the 2025 renewal of the Specific Grant Agreement between ICES and DG MARE which guides the provision of advice to the EU on fishing opportunities. https://www.clientearth.org/latest/documents/letter-to-european-commissioner-kadis-regarding-the-renewal-of-the-specific-grant-agreement-with-ices/.

34 Similarly, the Low Impact Fishers of Europe (LIFE) have also called for an urgent reform of the agreement between the EU's DG Mare and ICES to ensure scientific advice and the management it underpins promote stock growth and safeguard ecosystem health in line with the objectives of the CFP. LIFE letter to EU Commissioner Kadis, 8 May 2025. https://lifeplatform.eu/call-to-reform-the-agreement-with-ices-to-provide-scientific-advice-for-fisheries-management-external-inbox/.

35 Also see this briefing by the Pew Charitable Trusts (2024): To Improve Fisheries Management and Protect Ecosystems, Decision Makers Must Ask Better Questions. February 2024. https://www.pewtrusts.org/-/media/assets/2024/02/to-improve-fisheries-management-and-protect.pdf.

clients should request sufficiently precautionary alternative catch options that minimise the risks to population and ecosystem health, and in the meantime must build the necessary precaution into TAC-setting themselves by setting fishing limits below the single-stock headline advice (see above and Briefings 3 and 5).

- **Fulfil the EU's and the UK's legal obligation to apply the precautionary approach** (as defined by the UN Fish Stocks Agreement and enshrined in the CFP as well as the UK Fisheries Act) when setting TACs for stocks where scientific advice based on the MSY approach is not available and/or where the available advice does not fully reflect ecosystem needs and dynamics. This includes the setting of precautionary fishing limits and additional measures to mitigate the risk of overfishing, as well as enhanced monitoring and data collection to enable the definition of MSY reference points or suitable proxies for the stocks concerned. This is also critical for deep-sea stocks since most of these remain subject to precautionary advice. The application of the precautionary approach in the ecosystem context also means that the EU, the UK and other Parties exploiting shared stocks such as Norway must a) explicitly request ICES to provide sufficiently precautionary catch options to safeguard ecosystem health, where this is not yet fully reflected in the current ICES single-stock advice, and b) build the necessary precaution geared towards minimising risks to population and ecosystem health into TAC-setting, where such ecosystem-based and/or precautionary catch options are not yet available.
- **Fulfil the EU's and the UK's legal obligation to take an ecosystem-based approach to fisheries management, including for forage fish as well as top predators like sharks**. One fundamental step of fully implementing ecosystem-based fisheries management (EBFM) is to set TACs within ecological limits, i.e. TACs that account not just for the population health of target species but for the effects of fisheries on non-target species and food webs as well as for relevant environmental conditions. This is especially critical for forage fish (including for example Norway pout, sandeel, herring, sardines, anchovy and sprat) which have an important ecological role in supporting marine wildlife (such as seabirds, marine mammals and commercial fish species). This requires setting their TACs below the advised levels where ecosystem needs are not already fully factored into the scientific advice the TACs are based on, as well as commissioning the science needed to better account for these needs. See Briefing 5 for details.
- **Set TACs below the maximum catch advice for species vulnerable to the impacts of climate change and/or marine heatwaves**, or subject to other pressures or stressors, to provide a "climate buffer", and improve population resilience and invest in larger stocks with a healthy age/size structure and higher long-term productivity. See Briefing 5 for details.
- **For stocks caught and assessed within a mixed fishery, factor in ICES mixed fisheries considerations** to ensure that all stocks are restored and/or maintained above biomass levels capable of producing MSY. This means setting TACs for the more abundant stocks below their single-stock advice, where this is necessary to safeguard the more vulnerable stocks caught in the fishery. See Briefing 6 for further details. The EU and the UK should prioritise addressing any remaining concerns about the data or approach used in the current ICES mixed fisheries considerations, in order to support the effective application of the latter in TAC-setting.
- **For stocks managed through one of the EU's Multi-Annual Plans (MAPs), two of which are part of Retained EU Law in the UK as well, ensure that F_{MSY} point values are not exceeded and that the risk of stocks falling below B_{lim} is kept below 5%**. In order to restore and maintain stocks above biomass levels capable of producing the MSY, as required by the CFP, exploitation levels need to be set below F_{MSY}, especially for stocks that are currently still below the MSY biomass level. Therefore, while the MAPs allow for the use of the upper F_{MSY} range under certain limited conditions, TACs should not exceed the F_{MSY} point value, and should in fact be set within the lower F_{MSY} range or even below that where this is necessary to safeguard other stocks

in the same fisheries and/or boost stock resilience to other pressures. Important safeguards, such as the requirement in the Baltic Sea, North Sea and Western Waters MAPs to set fishing opportunities in a way that keeps the risk of stocks falling below B_{lim} below 5%, must be respected rather than removed, as the European Commission attempted in 2024 (see Briefing 2).

- **If multiannual TACs are pursued, ensure that these do not result in a failure to follow the most up-to-date best available scientific advice, or a failure to request such advice.** This may require setting TACs well enough below the respective ICES headline advice to provide a buffer against unforeseen stock decreases. In any case, safeguards are needed to ensure that TACs are reduced accordingly where new scientific advice indicates the stock status has deteriorated compared to when the multiannual TACs were initially set. While the desire for stability and predictability for the industry is understandable, we believe that the best way to achieve this is to allow stocks to recover well enough above sustainable levels to minimise the risk of large fluctuations in stock size between years, and to refrain from fully utilising increases in catch advice.
- **In the Mediterranean Sea, EU Member States should tackle overcapacity in the fleet**, and particularly improve control of engine power of trawlers to prevent fraud which seriously undermines the fishing effort regime. Data collection and stock assessments should be improved as well.
- **Fully implement the MAP for the Western Mediterranean**, particularly through the adoption of legally-mandated safeguard measures for fish populations below B_{lim} and B_{pa} levels, as well as further fishing effort restrictions. Additionally, the European Commission and Member States should prioritise the provision of disaggregated scientific data to inform and hone tailored reductions in fishing days and consider the potential addition of new gears, species and catch limits to the MAP. This is crucial to tackle excessive fishing mortality and achieve MSY exploitation by 2025[36] at the latest. See Briefing 7 for details.
- **Factor in the widely recognised lack of compliance with the landing obligation (LO) by reversing the quota uplifts that were given to avoid choke risks caused by the LO, and set TACs below the ICES headline catch advice**, to ensure the agreed TAC does not lead to fishing mortality beyond sustainable levels.[37] If quota adjustments are granted to account for previous discards, Member States should make them accessible only to vessels which demonstrate full compliance with the LO. Any alternative approaches to catch accounting such as the use of a multiplier (currently being explored in the UK) that determines how quickly a vessel's quota share is consumed depending on its discard rate, must be designed to guarantee that the authorised catch levels do not allow for overfishing. Moreover, fishing opportunities must be underpinned by robust monitoring and control, as they will otherwise not be sustainable on the water, even if they follow scientific advice on paper. See Briefing 8 for details.
- **In the case of stocks with zero catch advice, ensure that 'bycatch TACs' are not granted** unless and until a rebuilding plan has been implemented that effectively (1) reduces bycatch, (2) sets the relevant stocks on a pathway to recovery above levels capable of producing MSY as soon as possible, and (3) is closely monitored and enforced using remote electronic monitoring (REM) with cameras, supported by onboard observer coverage as appropriate. See Briefing 9 for further details. More generally 'bycatch TACs' are to be avoided as they facilitate unselective fishing at the expense of highly selective, targeted fisheries which better reflect best practice; incentivising a shift to more selective and low impact fishing should be a policy priority.

36 The deadline to achieve a sustainable exploitation rate by 2025 at the latest, beyond the original 2020 CFP deadline, was established exceptionally for the demersal stocks managed under the in the western Mediterranean multiannual plan. For recommendations on fishing opportunities in the Western Mediterranean, see section 5 of this document.
37 ClientEarth, 2020. Setting Total Allowable Catches (TACs) in the context of the Landing Obligation. July 2020.

- **Do not remove TACs**, as the removal of a direct limit on fishing mortality is not a sustainable management solution. In instances where a TAC has already been removed (e.g. dab and flounder and several deep-sea stocks), it should be reinstated. Removing a TAC downgrades the concerned stock from a situation where the catches are capped to limit fishing mortality, to a situation where catches are effectively unlimited. Even if a stock is not directly targeted, removing a TAC could leave a stock exposed to an unsustainably high fishing mortality, such as through high discarding rates.
- **When considering (re)opening of fisheries, for example following signs of population increases, apply a gradual, precautionary approach to safeguard population health, particularly for vulnerable species.** For example, the spurdog fishery was reopened in 2024 with individuals of 100 cm or less being taken off the prohibited species list and a TAC which fully exploits the ICES advice. As it had taken over a decade of strict management measures to see a tentative recovery, the reopening should have been more cautious, as noted by the UK-EU Written Record,[38] to prevent a boom and bust scenario. We urge caution when considering relaxing any of the current management measures, as the population is already vulnerable to increasing market demand. For the UK, we note that sections 5.3.5 and 5.3.6 of the Joint Fisheries Statement require regular reviews of sustainability measures for stocks not included in a fisheries management plan and that these reviews must be undertaken before new fisheries are opened or expanded. We are not aware that this approach was adopted for spurdog and highlight that, unfortunately, according to the Cefas assessment spurdog is being unsustainably managed.[39]
- **Apply a precautionary approach and ensure that robust fisheries management and monitoring measures are in place before considering opening new fisheries or expanding existing fisheries in response to climate change-related changes in fish population distribution**. Importantly, in the context of climate change a growing body of scientific research indicates and/or projects shifts in the distribution of certain species, for example northwards and/or into deeper waters, in response to ocean warming and related factors.[40] This could leave fish populations or parts thereof exposed to fishing in areas where those species previously did not occur and no catch limits or other management measures are in place yet. In addition to promoting timely updates regarding information on population distribution used in stock assessments for scientific catch advice, the EU, the UK and any third Parties involved in exploiting shared stocks must minimise the risk of unregulated fishing, by committing to not pursuing emerging fisheries in new areas and/or of new species until sustainable fisheries management measures, including science-based fishing limits and sharing arrangements between all relevant parties, have been put in place. Where such catches occur as part of existing fisheries for other stocks, they need to be reliably monitored and accounted for when setting fishing limits (by deducting the relevant quantities or precautionary estimates where data are limited) to ensure that these catches do not contribute to overfishing.
- **Prioritise and apply environmental criteria for national allocation of fishing opportunities**,[41] for example through incentivising use of selective fishing gear and low impact fishing practices

38 Written Record of fisheries consultations between the United Kingdom and the European Union for 2023. Section 4 d), p. 8.
39 Gilmour, F., Bell., E., O'Brien, CM. 2025. Assessing the sustainability of negotiated fisheries catch limits negotiated by the UK for 2025. Cefas project report for Defra. 32 pp. 19 March 2025, see pp. 18, 22 and 29. https://www.gov.uk/government/publications/assessing-the-sustainability-of-fisheries-catch-limits-negotiated-by-the-uk-for-2025
40 Examples include the following scientific papers referenced in a recent seminar by Cefas on "Fish stocks moving north", chaired by Prof. John K Pinnegar (July 2024): Perry et al. (2005). Climate change and distribution shifts in marine fishes. Science, 308(5730), pp. 1912-1915. https://www.science.org/doi/10.1126/science.1111322. Dulvy et al. (2008). Climate change and deepening of the North Sea fish assemblage: a biotic indicator of warming seas. Journal of Applied Ecology, 45(4), pp. 1029-1039. https://doi.org/10.1111/j.1365-2664.2008.01488.x. Simpson et al. (2011). Continental Shelf-Wide Response of a Fish Assemblage to Rapid Warming of the Sea. Current Biology, 21(18), pp. 1565-1570. https://doi.org/10.1016/j.cub.2011.08.016. Palacios-Abrantes et al. (2022). Timing and magnitude of climate-driven range shifts in transboundary fish stocks challenge their management. Global Change Biology, 28(7), pp. 2312-2326. https://doi.org/10.1111/gcb.16058. van der Jooij et al. (2024). Northward range expansion of Bay of Biscay anchovy into the English Channel. Marine Ecology Progress Series, 741, pp. 217-36. https://doi.org/10.3354/meps14603.
41 While the allocation of fishing opportunities is not part of the annual fisheries negotiations on the setting of fishing opportunities, sustainable fisheries management requires that fishing opportunities are both (1) set in a sustainable, precautionary and fully ecosystem-based way, and (2) allocated to fishers based on robust and transparent environmental criteria as outlined in this bullet point.

(such as avoiding bycatch of non-targeted marine life and damage to the seabed), in line with Section 25(3) of the UK Fisheries Act and Article 17 of the CFP basic regulation, and directing quota away from destructive fishing practices and parts of the fleet with a history of non-compliance. Quota allocation can also be a key tool to support low-impact fishing operations that are of greater importance to the local fishing community, e.g. in terms of employment opportunities and contribution to local economies. The European Commission should provide further guidance for the definition of low-impact fishing, monitor - and, where needed, enforce - compliance with Article 17, and require the Member States to make their allocation, and the criteria used, public. Similarly, the UK Government and devolved administrations should make their allocation, and the criteria used, public, while continuing to advance the roll-out of the "Quota Application Mechanism" (QAM) trial and addressing relevant questions or concerns about its ability to deliver on the requirements in Section 25(3) of the UK Fisheries Act (also see Briefing 2).[42]

- **Increase the transparency of the decision-making process regarding fishing opportunities, in line with the Aarhus Convention on Access to Information, Public Participation and Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention),**[43] including for international negotiations between the EU and the UK and/or involving Norway or other Coastal States. The improved access for NGOs since 2020 to certain parts of international negotiations, such as plenary sessions, on the initiative of the UK is a welcome development. We also welcome the publication of the Cefas report on the sustainability of agreed fishing limits on the UK government's website in recent years.[44] These reports clearly demonstrate the insufficient progress so far towards sustainable TAC-setting, and represent a notable improvement in transparency over the final decisions. We urge the UK and the EU to document and publish the relevant negotiating positions and records of negotiations in order to enable stakeholders to meaningfully follow and contribute to this important process. Specifically, the Council of EU ministers should apply the recommendations of the European Ombudsman to proactively publish documents related to the adoption of the TAC Regulation at the time they are circulated to Member States or as soon as possible thereafter.[45]

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.

42 See for example this press release: Department for Environment, Food & Rural Affairs (2025). New trial awards quota to fishers delivering sustainability and growth, 2 April 2025. https://www.gov.uk/government/news/new-trial-awards-quota-to-fishers-delivering-sustainability-and-growth.
We welcome this approach as a crucial first step towards aligning quota allocation with the requirements in Section 25(3) of the UK Fisheries Act. Also see Briefing 2.
43 UNECE. 1998. Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention).
44 Gilmour et al (2025). See footnote 39 for full reference. See pp. 18, 22 and 29.
45 European Ombudsman (2019), "Recommendation of the in case 640/2019/FP on the transparency of the Council of the EU's decision-making process leading to the adoption of annual regulations setting fishing quotas (total allowable catches)". European Ombudsman (2020). Council fails to accept Ombudsman's recommendation for transparency in EU fishing quota decision-making process. Case 640/2019/TE. https://www.ombudsman.europa.eu/en/case/en/54526. Also see: Transparency International, "Overfishing in the Darkness" (2016).

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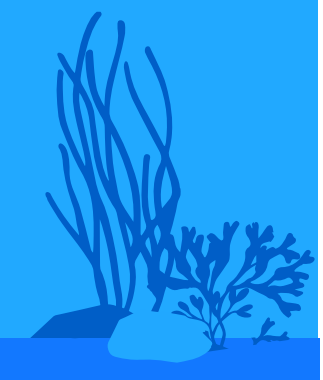

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ANNEX 1 - FULL REFERENCES TO ALL BRIEFINGS IN THIS SERIES

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/