

Mr Costas Kadis, Commissioner for Fisheries and Oceans
Directorate-General for Maritime Affairs and Fisheries (DG MARE)
European Commission, Rue Joseph II 99, 1000 Bruxelles, Belgique

11 April 2025

Subject: Renewal of the Specific Agreement with ICES – Ensuring scientific advice on fishing opportunities fully reflects EU legal requirements and policy objectives

Dear Commissioner Kadis,

We, the undersigned organisations working on fisheries and environmental policies, write to you regarding the upcoming renewal of the “Specific Grant Agreement” between the European Commission and the International Council for the Exploration of the Sea (ICES) which guides the provision of scientific advice on fishing opportunities.¹

Many fish populations remain overfished, some in a dire state without tangible signs of recovery, putting at risk ocean health, the fisheries that depend on it and the EU’s food sovereignty. This is not just a result of fishing limits routinely exceeding the scientific advice, it is also linked to shortcomings in the advisory approach itself. The renewal of the Specific Agreement offers a key opportunity to address these issues.

We urge you to initiate key improvements to the advisory process ahead of this year’s fisheries negotiations, and to apply additional precaution until the necessary changes have been made, by proposing fishing limits below the single-stock advice.² This would be an effective step towards meeting the goal of the European Ocean Pact (EOP) to maintain a “*healthy, resilient and productive ocean*” that can sustain thriving, sustainable fisheries and coastal communities - a vision also endorsed by the 140+ organisations that signed the Blue Manifesto: Roadmap to a Healthy Ocean in 2030.³

The current ICES advice on fishing opportunities does not fully reflect all relevant legal requirements and policy objectives applicable to the EU⁴ or the EOP’s core aims. Specifically, it is 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 the risk of, falling outside safe biological limits, despite legal safeguards in the EU’s Multi-Annual Plans (MAPs); or
- (3) delivering on all relevant elements of “Good Environmental Status” (GES) under the Marine Strategy Framework Directive (MSFD), 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.⁵

¹ Last year’s Specific Grant Agreement 512.918553 under Framework Partnership Agreement MARE/2023/ICES: https://www.ices.dk/about-ICES/Documents/Cooperation%20agreements/EU/2024_DGMARE-ICES_Grant_web.pdf.

² For further details and background, please refer to the joint NGO recommendations to the EU on fishing opportunities for 2025: <https://www.clientearth.org/latest/documents/joint-ngo-recommendations-to-the-eu-on-fishing-opportunities-for-2025/>.

³ <https://seas-at-risk.org/blue-manifesto/>.

⁴ See footnote 2: section 2 and 4 and Box 2 and 4 of this document explain our concerns summarised here in more detail.

⁵ For example, last year’s ICES/EU Specific Agreement recognises that “*Limitations on fisheries may be required to achieve environmental objectives, especially regarding biodiversity, habitat integrity and foodwebs*”, and that “*ICES may, if requested, advise on the likely impact of such limitations on the catch but will, as explained, not include such considerations in the advice on fishing opportunities.*” (see footnote 1, p.79). This confirms that the current ICES advice on fishing opportunities is not designed to ensure that the advised catch levels are compatible with achieving environmental objectives, e.g. regarding GES.

In order to address these issues and ensure policy coherence, the Commission and other ICES advice clients need to explicitly request advice from ICES that aims to rebuild fish populations and maintain ocean health while minimising risks to both. Positive initiatives that could at least partially address some of the above shortcomings are already underway within ICES, such as work on rebuilding advice,⁶ improving precaution for depleted stocks,⁷ and the recent guidelines for advice on fisheries that concurrently catch a mix of stocks of the same species.⁸ However, their swift integration into the formal advisory process needs the Commission's full support, and obstacles to the necessary changes must be urgently identified and removed.

Specifically, we urge the European Commission, where necessary involving collaboration between DG MARE and DG ENV and/or with other ICES advice clients, **to request ICES to:**

- 1. Provide advice on fishing opportunities that is explicitly geared towards rebuilding fish populations above sustainable levels within concrete and ambitious timeframes, and that respects safeguards in the MAPs.** ICES could begin to roll out a rebuilding advice approach based on existing work and international best practice as a default. Fishery-specific conversations regarding bespoke rebuilding plans could continue in parallel to inform the advice basis in future.
- 2. Visibly include additional elements in the ICES advice sheet to support fisheries decisions that factor in mid- and longer-term implications.** The current focus on short-term biomass projections and catch advice does not reflect the potential mid- or longer-term costs and benefits of different catch options. Integrating and visualising these aspects could support more informed decisions aiming for larger, more productive populations that could sustain larger catches in the future, which may outweigh short-term impacts of quota cuts.
- 3. Fully and coherently integrate broader policy objectives regarding population and ecosystem health (beyond single-stock maximum sustainable yield exploitation).** The catch levels that ICES advises must be compatible with other EU commitments, such as GES under the MSFD in line with the holistic approach to Ocean Governance promoted by the Commission under the European Ocean Pact. For example, the advised catch levels should leave enough food in the sea for thriving populations of dependent predators, such as other fish, seabirds and cetaceans.
- 4. Enhance the presentation of the ICES advice to minimise the risk of misinterpretation, improve the science-policy interface and foster transparency in fisheries management.** The "headline" advice at the top of the advice sheet should be complemented with an executive summary highlighting key caveats and uncertainties where the advised catch level does not fully reflect all relevant legal requirements and policy objectives and indicating what the impact of that may be.

⁶ For example, the WKREBUILD2 process developed concrete suggestions for a path towards advice aimed at rebuilding depleted or struggling fish populations, but these have not been implemented yet. 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>.

⁷ 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.

⁸ ICES (2024). ICES Guidelines for advice on fisheries that concurrently catch a mix of stocks of the same species. ICES Technical Guidelines. Report. <https://doi.org/10.17895/ices.pub.25764972.v1>. These guidelines are a clear step towards visibly accounting for fisheries impacts on other stocks.

Recognising and addressing the above shortcomings and ensuring that ICES advice on fishing opportunities applies the legally required ecosystem-based approach will not only improve the health of fish populations; it will also strengthen ocean resilience in the face of mounting pressures like climate change, support the long-term viability of fisheries-dependent communities and ensure access to sustainable seafood for current and future generations. Moreover, it is also in line with commitments made by the Commission in response to a joint recommendation by six Advisory Councils regarding stakeholder engagement in ICES advice request formulation.⁹

We urge the Commission to use the upcoming renewal of the Specific Agreement to ensure that ICES advice fully reflects these critical needs.

We would welcome the opportunity to discuss these recommendations further and look forward to your response.

Yours sincerely,



Anaïs Berthier
Head of Brussels, ClientEarth

On behalf of:

Baltic Salmon Fund, Baltic Salmon Rivers Association, Baltic Waters, Bass Angling Conservation, BirdLife Europe and Central Asia, Blue Marine Foundation, ClientEarth, Coalition Clean Baltic, Deutsche Umwelthilfe e.V. (DUH), Deutsche Stiftung Meeresschutz (DSM), European Anglers Alliance (EEA), FishSec, North Sea Foundation, Oceana in Europe, Sciaena, Seas At Risk, Swedish Society for Nature Conservation



⁹ Joint NSAC-LDAC-PelAC-NWWAC-SWWAC-BSAC Advice on stakeholder engagement in ICES advice request formulation, October 2024, https://www.ldac.eu/images/Joint-AC_Advice_on_Stakeholder_Engagement_in_ICES_Advice_request_formulation_Oct2024.pdf. And the Commission's response: <https://www.nsrac.org/wp-content/uploads/2024/10/01-2425-Response-to-JointACs-Advice-on-stakeholder-engagement-in-ICES-advice-request-formulation.pdf>.