



Sustainability Impact Assessment

7/10/26

Ireland will play a key role in overseeing and leading this year's Agrifish discussions in their role as Council Presidency. **We urge you to set and reach a clear objective for these negotiations: to ensure the recovery and significant improvement 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 (1). Ireland has championed the EU Ocean Pact, even holding a Presidency event on this piece of legislation in July 2026.

The setting of fishing opportunities must be precautionary and set well below the best available scientific advice on maximum catches and target fishing mortality. Doing this would help put an end to overfishing, restore and maintain fish populations into the long term and help ensure marine ecosystem health. This is necessary to enhance climate resilience, reduce biodiversity loss and ensure economic sustainability for the fishing industry.

As Ireland has the Council Presidency, it is our responsibility to work with the Commission and the Council to put the EU on a path to sustainable, recovery focused and ecosystem based fisheries. Ireland must remind other Member States about this responsibility and guide the discussions on the benefits of investing in fish population health as well as ecosystem health and the extreme costs (both environmentally and economically) of failing to do so.

Precautionary approach

Setting TACs at or even above ICES advice, which is repeatedly done year after year, is not legally compliant with the maximum sustainable yield (MSY) requirement of the EU Common Fisheries Policy or the precautionary objective of recovering and maintaining all stocks above levels capable of producing MSY in the UK fisheries act. It does not respect key legal safeguards in the multi annual plans. Articles published in Science in 2024 (2) and 2025 (3) showed that current stock assessments tend to overestimate productivity and the recovery trajectory. 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 (4). With this in mind extra caution should be used when setting fishing opportunities if we are to rebuild fish populations and reduce the risk of fishery and ecosystem collapse. For further detail we recommend reading Client Earth's Joint Briefing Series: Recommendation to the EU and the UK on fishing opportunities (5). Unfortunately, illegal, unregulated and unmonitored fishing still occurs and we must factor in these catches in the setting of TACs. We should also provide a buffer in the case of unfavorable, unexpected changes in the status of fish populations. This will help to facilitate long-term market stability by avoiding large fluctuations in TACs between years (6).

Limitations of scientific advice

There are shortcomings in the scientific single stock advice that ICES provides which must be recognised. The current ICES advisory framework is not designed to support rapid stock recovery by safeguarding ecosystems. It does not contain a recovery target or timeframe to prevent fish populations from falling outside safe biological limits in the short or mid term. We ask that the Minister call on the rest of the EU and the UK to work alongside ICES to address the concerns highlighted and to ensure that ICES advice aims for rapid recovery above sustainable levels for fish populations, taking into account the ecosystem approach and ensuring a healthy size and age structure within these populations. The 2024 Specific Grant Agreement between ICES and DG MARE states, '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.' **We ask that Ministers request ICES to provide clarifications of shortcomings in the advisory approach and address issues as well as provide interim recommendations on how the current advice can meet all relevant legal requirements.** Until this happens it is the fisheries Ministers responsibility to integrate the necessary additional precaution into decisions.

Shared fisheries

Unilateral processes leading to catches above scientific advice must be avoided. Talks on joint management should be comprehensive, including all relevant cooperative coastal states and stakeholders. The United Nations Convention on the Law of the Sea⁹ (UNCLOS) determines that collaboration on management must be multilateral when more than two coastal states have a stake in a given fish population, or fishery. It is vital that talks between third party countries with shared fishing interests result in safe biological limits being adhered to and that countries do not exceed scientific advice on



catches. Top priority must be resolving the allocation issues of pelagic stocks (mackerel, herring, and blue whiting) with the NEAFC Contracting Parties. Without doing so these fish populations will not be given a chance to recover.

Small scale fisheries

At national level we call for full implementation of Article 17 of the Common Fisheries Policy so that small scale fishing communities receive a fair share of the quota. This Article, when properly implemented, is a mechanism to ensure fair and sustainable quota allocation taking into account social and environmental criteria, not only economic. Relying on historical catch records has negatively impacted the economy of small scale coastal fisheries and communities as well as the environment. This has led to some fishing communities having an over reliance on non quota species which then impacts the entire marine food web, including other commercially valuable species. At EU level, we must push for a reopening of the relative stability key so that Irish fishing vessels receive a fair and proportionate amount of quota, which can then be distributed fairly at national level. This is necessary if we are to support coastal communities and protect Ireland's unique marine environment.

We look forward to continued engagement on this matter.

Le meas,

Grace Carr

Marine Advocacy Officer

Irish Wildlife Trust

Member of the Irish Environmental Network and Environmental Pillar

1. https://oceans-and-fisheries.ec.europa.eu/news/shaping-european-oceans-pact-commission-launches-call-evidence-2025-01-20_en
2. 1. 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> 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>



3. 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.
4. 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 FMSY 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.
5. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>
6. Froese et al. (2025) highlight that “as long as the stock size fluctuates above the legally required minimum level (BMSY), 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.

