



Sustainable fishing in the EU: State of play and orientations for 2027

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The Irish Wildlife Trust is an environmental NGO working on issues around marine conservation including marine protected areas and fisheries. We welcome the opportunity to submit to this important EU consultation.

Shared Fisheries

The setting of TACs must be in line with best scientific advice. In regards to mackerel, 'in December the UK, Norway, Iceland and the Faroe Islands agreed on a TAC which exceeds the ICES advice by 71%. The EU set a provisional TAC in line with the ICES advice in December 2025. In order to restore the level playing field and taking into account that these coastal States did not intend changing their decision on the level of the TAC, in March 2026 the EU aligned with the TAC level decided by these other coastal States.' Greater alignment between countries must be a priority, allocation issues must be resolved and clear sharing arrangements must be developed. Allowing a TAC over 70% higher than the best scientific advice will only result in the collapse of the fish population and the concurrent collapse of the fishery and any economic benefits. We call on countries to uphold and deliver on their shared responsibility to ensure sustainability commitments in negotiations. We ask that countries insist on ecosystems based and precautionary fisheries management to allow fish populations to recover. Clear long term objectives and harvest strategies should be upheld in negotiations.

Landing obligation

It is clear that the landing obligation is not being adhered to through several audits by the Commission as well as compliance reports. We recommend that poor compliance is factored into TAC decisions and also that TACs should be set lower than the best scientific advice to counteract illegal dumping at sea. This is in line with applying the precautionary approach. There must be a swift roll out of remote electronic monitoring across EU and UK waters. Quota 'top ups' should also be conditional on compliance with



the landing obligation and full catch documentation. The Commission should have a zero tolerance policy for non compliance.

2027 fishing opportunities

We ask the Commission, Council fisheries ministers and third party countries to stop repeating past management mistakes which have been a major contributor to the situation we are in now with fish populations still struggling and fishing fleets suffering socio economic consequences. In order to ensure a healthy ocean and thriving coastal communities overfishing must be stopped. Decisions should prioritise restoring fish populations to healthy and productive levels and allowing the rapid recovery of depleted populations. The ecosystems based approach must be fully implemented explicitly factoring ecosystem integrity and dynamics in the setting of TACs.

The current ICES advice framework (and the requests made by the fishery managers that guide them) looks at single stocks and is not designed to allow for the rapid recovery of depleted fish populations or safeguard ecosystem health. ICES advice does not have a recovery target, timeframe or a safeguard to prevent fish populations falling below safe biological limits. It also does not deliver on good environmental status for all relevant descriptors in the Marine Strategy Framework Directive (MSFD) and the UKs Marine Strategy Regulation 2010. This includes food web integrity and biodiversity, two of the most important elements in the MSFD which have an impact on most other descriptors. 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.' ICES must provide specific clarification of the shortcomings in the current approach and highlight where advisory catch limits do not meet all legal requirements.

The document states that the Commission and 8 Baltic member States came to an agreement, '*on the need to request the International Council for the Exploration of the Sea (ICES) to provide in its annual stock specific catch advice, scenarios to rebuild the fish stocks concerned to the required biomass levels within different timeframes. Such advice should take into account the biological characteristics of the stocks and show different catch levels for the respective rebuilding phase.*' We strongly agree that a similar approach be taken in all sea basins if we are to tackle overfishing at an EU level.

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 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 (1) and 2025 (2) showed that current stock assessments tend to overestimate productivity and the recovery trajectory. 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 (3).

Ecosystem health

The Commission's communication also states that ecosystem health also conditions fisheries health. It recommends that Member States increase efforts to decrease adverse impacts on the marine environment (reduction of bycatch and impacts on the seabed). It suggests that Joint Recommendations (JR) should be initiated through the Common Fisheries Policy recommending *'the deployment of market-ready selective gears and of modern gear technology, as well as measures to limit fishing pressure on sensitive habitats and species and in marine protected areas'*. Very few Joint Recommendations have been successfully initiated by EU Member States and Ireland has failed to submit any. We believe that the Commission should use their powers to push Member States into utilising this article of the CFP and start strictly enforcing this. Member States will be submitting their first draft National Restoration Plans (NRP) by September 1st 2026 under the Nature Restoration Regulation. It is vital that plans for JRs are documented in this and that the Commission does everything in their power to ensure the successful implementation of this. DG MARE and other relevant bodies responsible for fisheries management should also put pressure to ensure draft National Restoration Plans are as ambitious as possible to help rebuild fish populations. The communication also references the Marine Action Plan. Member States were due to submit roadmaps on how they intended to reach the goals of the Marine Action Plan but many Member States did not complete this. The action plan, while not legally binding, *'promoted the use of less damaging fishing gear, protecting sensitive species and habitats and balancing environmental conservation within the socio-economic reality, while promoting a fair and just transition'*. We believe that the Commission should ensure that these goals are reflected in Member States NRPs and that clear actions with timelines are documented within the plans to achieve these goals.

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>
2. 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.
 3. <https://www.clientearth.org/latest/press-office/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>