



Joint NGO Feedback to the European Commission's Consultation  
on Sustainable Fishing in the EU – Orientations for 2026

## **Introduction:**

On behalf of the undersigned organisations, we welcome the opportunity to respond to the European Commission's consultation on the state of play and orientations for sustainable fishing in 2026. To underpin our answers, **we have produced a joint Briefing Series outlining our key recommendations on fishing opportunities, signed by nearly 30 organisations (including environmental NGOs and recreational fishing representatives) across all European sea basins.**<sup>1</sup> This Briefing Series delves into the core issues addressed in this consultation response and we urge you to carefully review both alongside each other. Please also refer to the joint NGO recommendations on fishing opportunities in the Baltic Sea for more specific input on that area.<sup>2</sup>

We acknowledge the Commission's recognition that **sustainability of European fisheries has improved compared to the early 2000s**, with more fish stocks being fished at sustainable levels in 2024 than in 2003.<sup>3</sup> This is a notable achievement that reflects the potential of the Common Fisheries Policy (CFP) to drive positive change - a potential which needs to be maximised by ensuring its provisions are implemented correctly.

However, **DG MARE's reporting on progress towards ending overfishing overlooks key indicators of population and ecosystem health**, such as age/size structures and food web integrity, which **masks fundamental flaws in EU fisheries management and how success is measured.**<sup>4</sup> This means conclusions drawn exclusively based on such reporting, without appropriate assessment against biomass- and ecosystem-health-related targets, are incomplete and potentially misleading.<sup>5</sup> **Despite long-term progress in reducing overfishing in some regions, many challenges and shortcomings remain.** The EU has missed its legally binding 2020 deadline to end

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<sup>1</sup> Joint Briefing Series: Recommendations to the EU and the UK on fishing opportunities. July 2025. The Series consists of 11 briefings and can be accessed here:

<https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>. This [Cover Briefing](#) contains our key recommendations.

<sup>2</sup> Joint NGO recommendations on Baltic Sea fishing opportunities for 2026. 17 June 2025.

<https://www.fishsec.org/2025/06/17/joint-ngo-recommendations-on-baltic-sea-fishing-opportunities-for-2026/>.

<sup>3</sup> European Commission (2025), Communication from the Commission to the European Parliament and the Council: Sustainable fishing in the EU: state of play and orientations. COM(2025) 296 final. We note however that the underlying most recent data from STECF refer to 2023, not 2024.

<sup>4</sup> See [Briefing 2](#) in our Joint Briefing Series "Recommendations to the EU and the UK on the setting of fishing opportunities" – Briefing 3 of 11: "Best available" is not good enough - addressing shortcomings in the current scientific advice. July 2025.

<sup>5</sup> Also see ClientEarth (2020) Let's get the numbers right: What proportion of fish stocks are sustainably managed in the EU?

<https://www.clientearth.org/latest/documents/lets-get-the-numbers-right-what-proportion-of-fish-stocks-are-sustainably-managed-in-the-eu-1/> July 2020.

overfishing, as set out in Article 2(2) of the CFP Basic Regulation,<sup>6</sup> and failed to achieve Good Environmental Status (GES) under the Marine Strategy Framework Directive (MSFD) by the same year.<sup>7</sup>

**While the legal framework is robust, implementation remains inconsistent and incomplete.** Objectives such as restoring and maintaining populations above sustainable levels, the legally required level of precaution, as well as key GES requirements regarding wider ecosystem health are not adequately reflected in the scientific advice underpinning fishing opportunities. Briefing 3 in our joint Briefing Series provides further details on **shortcomings in the advice provided by the International Council for the Exploration of the Sea (ICES) and in the requests by its clients, including the European Commission**, and provides recommendations to address these.<sup>8</sup> Implementation of EU law is further undermined by political decisions that routinely exceed scientific single-stock advice<sup>9</sup> and fail to incorporate the necessary precaution in the face of uncertainty around ecosystem dynamics and how these are impacted by fisheries, and in terms of preventing dangerous population declines.<sup>10</sup>

This failure is not simply a technical shortcoming. It carries real ecological, economic and social consequences. Fleet segments that rely on overfished stocks or operate in an unsustainable and energy-intensive way continue to face declining profitability. In contrast, those operating within sustainable limits and who have invested in energy efficiency tend to perform better and provide more stable incomes for their crews. These differences, highlighted in the Commission's socio-economic analysis, clearly illustrate that **sustainable fisheries are not only ecologically sound but also economically advantageous in the long run.**<sup>11</sup> Ending overfishing, as mandated by the CFP, and embedding the objective of a "*healthy, resilient and productive ocean*" into the

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<sup>6</sup> [Regulation \(EU\) No 1380/2013](#) of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, referred to here as "CFP Basic Regulation".

<sup>7</sup> Marine Strategy Framework Directive Evaluation 2025. 6 March 2025.

[https://environment.ec.europa.eu/document/659eea3a-8a00-410e-bc2f-f94baf210c9b\\_en](https://environment.ec.europa.eu/document/659eea3a-8a00-410e-bc2f-f94baf210c9b_en)

<sup>8</sup> Joint Briefing Series "Recommendations to the EU and the UK on the setting of fishing opportunities" – [Briefing 3 of 11](#): "Best available" is not good enough - addressing shortcomings in the current scientific advice. July 1015.

<sup>9</sup> See for example ClientEarth (2024). Taking stock 2024 - are TACs set to achieve MSY?. November 2024.

<https://www.clientearth.org/latest/documents/taking-stock-2024-are-tacs-set-to-achieve-msy/>

<sup>10</sup> Joint Briefing Series "Recommendations to the EU and the UK on the setting of fishing opportunities" – [Briefing 3 of 11](#): "Best available" is not good enough - addressing shortcomings in the current scientific advice. July 1015. For example, the current ICES advisory approach frequently produces ICES headline advice on maximum catch levels which is associated with a higher than 5% risk of the stock falling below Blim, which does not reflect a key provision in the EU's Multi-Annual Plans (MAPs), included for example in Article 4(7) in the [Western Waters MAP](#), Regulation (EU) 2019/472..

<sup>11</sup> European Commission (2025), Communication on the state of play of sustainable fishing in the EU.

heart of EU fisheries management,<sup>12</sup> as envisioned in the European Ocean Pact (EOP), as well as existing GES requirements, is essential for biodiversity protection, coastal communities viability, and the future of the fishing sector.

### **Key policy recommendations:**

At a time when the ocean, and the people that depend on it, face unprecedented challenges like the climate and biodiversity crises, the Commission, Council and Member States should urgently future-proof EU fisheries by:

1. **Ending overfishing:** fully applying the precautionary approach to fisheries management and ensuring 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 minimising incidental catches, to safeguard and boost ecosystem health, resilience and productivity.
4. **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.<sup>13</sup>

**Our overarching key recommendation to achieve the above remains to propose and set fishing opportunities well below - and under no circumstances above - the best available scientific single-stock advice provided by ICES, where this does not yet fully reflect and safeguard ecosystem integrity and dynamics and/or is not explicitly geared**

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<sup>12</sup> This wording was used for example in the European Commission's call for evidence to shape the EOP. 20 January 2025. [https://oceans-and-fisheries.ec.europa.eu/news/shaping-european-oceans-pact-commission-launches-call-evidence-2025-01-20\\_en](https://oceans-and-fisheries.ec.europa.eu/news/shaping-european-oceans-pact-commission-launches-call-evidence-2025-01-20_en).

<sup>13</sup> 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 Blim 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](#).

**towards rapid recovery and/or maintaining populations above sustainable biomass levels.**

We provide further details below on how to operationalise the above, which are also reflected and further elaborated on in our joint Briefing Series.<sup>14</sup> The European Commission, and more specifically DG MARE, has the power and the responsibility to finally set the EU on a path towards truly sustainable, recovery-focused and ecosystem-based fisheries, by

- (a) setting the tone for this year's negotiations with your proposals,
- (b) reminding negotiation partners of the benefits of investing in stock and ecosystem health, and
- (c) highlighting the environmental and socio-economic consequences of failing to do so.

### **Aligning fishing opportunities with EU law**

Despite the legal, environmental and economic rationale for implementing the CFP in full, the approach to setting fishing opportunities continues to fall short of what is needed. Total Allowable Catches (TACs) are routinely set above the maximum levels advised by ICES, particularly for depleted or struggling stocks that are primarily caught as “bycatch” as part of mixed fisheries alongside more abundant target stocks.<sup>15</sup> The result is continued overexploitation of vulnerable stocks, for the sake of avoiding short-term fisheries closures or quota cuts, and a failure to rebuild fish populations above sustainable levels as legally required. This consistent failure to safeguard depleted stocks in order to fully exploit the more abundant target stocks perpetuates a vicious cycle of overfishing and ‘choke’ situations—whereby fishing activity must cease due to exhausted quotas for ‘bycatch’ species even though quota for target stocks is still available.<sup>16</sup> This not only jeopardises stock recovery but undermines the socio-economic stability of the sector as a whole. The dire situation in the Celtic Sea mixed gadoid fishery illustrates the consequences of this kind of mismanagement: after cod and whiting had already been depleted and subject to zero-catch advice from ICES for 8 and

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<sup>14</sup> Joint Briefing Series: Recommendations to the EU and the UK on fishing opportunities. July 2025. <https://www.clientearth.org/latest/documents/joint-briefing-series-recommendations-to-the-eu-and-the-uk-on-fishing-opportunities/>.

<sup>15</sup> See [Briefing 6](#) of 11 in our Joint Briefing Series: Mixed fisheries considerations. July 2025.

<sup>16</sup> Also see [Briefing 9](#) of 11 in our Joint Briefing Series: Depleted stocks with zero or very low catch advice. July 2025.

2 years, respectively, haddock - which was previously used to justify keeping the fishery open - has now also received zero-catch advice for the first time.

Furthermore, while EU recovery and precautionary requirements apply to all harvested species, non-TAC stocks are typically unmanaged and fail to meet policy objectives. Some of these have been exploited unsustainably for many years, including the critically endangered European eel, European sea bass in the North Sea, Irish Sea, English Channel, Bristol Channel and Celtic Sea and sardine in the Cantabrian Sea and Iberian Atlantic waters. In addition, very few effective management options have been explored for minimising bycatch of vulnerable and critically endangered species like tope shark (*Galeorhinus galeus*).

The only truly sustainable way out of this dilemma - both environmentally and socio-economically - is to urgently prioritise the recovery of all depleted stocks, by:

- Requesting scientific mixed fisheries scenarios that are explicitly geared towards rebuilding depleted stocks including non-TAC stocks;
- Setting TACs for more abundant stocks below their single-stock advice to safeguard others caught in the mix;
- Introducing effective management measures for all non-TAC stocks;
- Adopting appropriate spatial measures;
- Ensuring full catch documentation;
- Maximising selectivity of fishing operations;
- Assessing and minimising fisheries impacts on non-quota species and other marine life.

#### **Implementing a precautionary and ecosystem-based approach:**

We welcome the recognition in the Commission's Communication that "*A competitive and economically viable fishing sector relies on healthy fish stocks and a healthy ocean*". To set EU fisheries on a clear path towards long-term environmental and socio-economic sustainability, it is essential that the European Commission adopts a more recovery-focused, precautionary and ecosystem-based approach when proposing fishing opportunities for 2026. This means investing in the resilience of populations and ecosystems by fishing well below the maximum catch level advised by ICES, i.e. the "headline" figures at the top of its single-stock advice, and by the Scientific, Technical and Economic Committee on Fisheries (STECF) for the Mediterranean, rather than setting fishing opportunities at or even above this level. This is necessary to ensure that

catch limits reflect the broader ecosystem context,<sup>17</sup> mixed fisheries considerations,<sup>18</sup> the need to rebuild depleted populations,<sup>19</sup> and the uncertainties inherent in stock assessments.<sup>20</sup> Importantly, **this recommendation to propose and set fishing opportunities below the scientific single-stock advice does not suggest new rules or a change in policy objectives, but is purely based on fully implementing the existing legal framework and agreed shared policy objectives between the EU and the UK.** This includes the precautionary principle, the objective of maintaining or restoring stocks above levels capable of producing maximum sustainable yield, and the requirement to adopt an ecosystem-based approach, including the achievement of GES.<sup>21</sup>

The Commission's Communication rightly identifies multiple non-fishing pressures that increasingly affect fish populations, from eutrophication in the Baltic to climate change impacts in the Bay of Biscay and Mediterranean. Yet, these pressures are rarely considered when setting fishing opportunities. Fisheries management continues to rely heavily on single-species advice that does not fully account for ecosystem interdependencies, food web dynamics or the wider role of harvested species in marine habitats.<sup>22</sup> A key example is the exploitation of forage fish such as sandeel, herring and sprat—species critical to the diet of seabirds, marine mammals and larger predatory fish. Despite ICES acknowledging that current advice does not guarantee enough biomass is left in the sea for predators,<sup>23</sup> TACs for these species are still set at or near MSY levels. This directly undermines EU commitments under the MSFD and the new Nature Restoration Regulation.

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<sup>17</sup> Also see [Briefing 5](#) of 11 in our Joint Briefing Series: Fishing opportunities in an ecosystem context. July 2025.

<sup>18</sup> Also see [Briefing 6](#) of 11 in our Joint Briefing Series: Mixed fisheries considerations. July 2025.

<sup>19</sup> Also see [Briefing 9](#) of 11 in our Joint Briefing Series: Depleted stocks with zero or very low catch advice. July 2025.

<sup>20</sup> See for example the issue of “phantom recoveries” for depleted stocks as reported by Edgar et al. (2024), Froese & Pauly (2024) and Froese et al. (2025), due to assessments overestimating productivity and recovery trajectory. 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>. 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>. 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](https://doi.org/10.1126/science.adv4341). May 2025.

<sup>21</sup> See [Briefing 2](#) of 11 in our Joint Briefing Series: Context and legal framework. July 2025.

<sup>22</sup> Also see [Briefing 5](#) of 11 in our Joint Briefing Series: Fishing opportunities in an ecosystem context. July 2025.

<sup>23</sup> EU-UK request on ecosystem considerations in the provision of single stock advice for forage fish species. ICES Advice: Technical Services. Report. <https://doi.org/10.17895/ices.advice.24638433.v1>. For example, this states in the overall conclusion that “What is not conducted in the assessments is specific analysis of whether the forage fish biomass is kept high enough for specific predator requirements” (p. 1).



Briefing 3 in our joint Briefing Series shows in more detail that **the current ICES advice on fishing opportunities and requests for it from ICES clients such as DG MARE do not fully reflect all EU legal requirements and policy objectives, as they are not fully recovery-focused, sufficiently precautionary or designed to safeguard ecosystem health in line with GES.** This Briefing is also supported by the Low Impact Fishers of Europe (LIFE) and several representatives of the recreational sector, and the topic was already brought to the attention of Commissioner Kadis earlier this year.<sup>24</sup>

**The European Commission, and specifically DG MARE, plays a key role in addressing and accounting for these fundamental shortcomings, (a) as one of the main advice requesters to ICES, and (b) as one of the main users of ICES advice** as you draw up your proposals and non-papers, and engage with the Council and other negotiation partners throughout the autumn. It is therefore crucial that you recognise these shortcomings and their implications, and account for them in your proposals from the outset, by proposing fishing opportunities well below the ICES headline advice.<sup>25</sup>

### **Better implementation of the legislative framework, notably the Landing Obligation**

Equally critical is the need for full implementation of the CFP, and most notably of the landing obligation (LO).<sup>26</sup> More than six years after the LO's full entry into force, compliance remains poor, with continued illegal discards and minimal enforcement. The lack of accurate catch documentation seriously compromises scientific assessments and, by extension, the sustainability of TAC-setting. The continued under-reporting of discards leads to inflated catch allowances and overexploitation in practice. Furthermore, the well known issue of misreporting of catches, such as in the Baltic Sea,

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<sup>24</sup> Joint letter to European Commissioner Kadis regarding the renewal of the Specific Grant Agreement with ICES. 11 April 2025.

<https://www.clientearth.org/latest/documents/letter-to-european-commissioner-kadis-regarding-the-renewal-of-the-specific-grant-agreement-with-ices/>. LIFE sent a similar letter on this topic in May 2025,

<https://lifeplatform.eu/call-to-reform-the-agreement-with-ices-to-provide-scientific-advice-for-fisheries-management-external-inbox/>.

<sup>25</sup> The [Cover Briefing](#) of our joint Briefing Series provides more detailed recommendations on how this could be operationalised based on the currently available catch options in the ICES advice sheet, while fully recovery-focused, precautionary and ecosystem-based advice is not yet available. Briefing Series “Recommendations to the EU and the UK on the setting of fishing opportunities” – Briefing 1 of 11: Cover briefing: Key recommendations on setting fishing opportunities. July 2025. See pp. 6-7.

<sup>26</sup> See [Briefing 8](#) of 11 in our Joint Briefing Series: Landing Obligation challenges. July 2025.



brings uncertainty into the stock assessments and advice, justifying a more precautionary approach when using such advice.

These issues must be urgently remedied and, in the meantime, factored in when setting fishing opportunities, by setting TACs lower than the ICES maximum catch advice, and applying sufficiently precautionary safeguards as part of catch accounting.<sup>27</sup> Improved control, enforcement, onboard monitoring and sampling of landings must be implemented to ensure that misreporting, such that of sprat as herring in the Baltic Sea, and other types of misreporting do not occur.

We strongly support the Commission's call for the rapid roll-out of Remote Electronic Monitoring (REM) systems with cameras on board as a key control tool to ensure that all catches are counted and documented. Making access to quota "top-ups" conditional on demonstrated compliance with the landing obligation, as proposed in previous consultations, should become standard practice across all Member States.

### **Rebuilding depleted stocks with zero or low catch advice:**

Nowhere is the need for urgent action clearer than in the case of depleted stocks subject to zero or very low catch advice.<sup>28</sup> These include iconic stocks such as Celtic Sea and Irish Sea cod and whiting, Baltic cod and herring, and more recently, Eastern Channel common sole. Many of these stocks are far below the minimum biomass thresholds below which reproduction is likely to be impaired. Continued fishing—even under the guise of "bycatch TACs"—without comprehensive, binding rebuilding plans perpetuates a vicious cycle: mixed fisheries are eternally overshadowed by “choke” risks, created and continued by overfishing of depleted stocks to avoid short-term quota cuts or closures. This cycle traps fishers, ecosystems, and policymakers alike in a situation of chronic suboptimality. It is not only scientifically indefensible, but also legally questionable given the binding obligations of both the EU and the UK to restore populations above levels capable of producing Maximum Sustainable Yield. EU and UK decision-makers, including the European Commission, must urgently put stock rebuilding at the heart of their fisheries decisions to finally escape this dilemma, by:

- Requesting ICES to provide tailored scientific advice that is explicitly geared towards rebuilding stocks above sustainable levels within a clear timeframe, and preventing them from falling below them;

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<sup>27</sup> *Ibid.*, see details on catch accounting on p. 4.

<sup>28</sup> See [Briefing 9](#) of 11 in our Joint Briefing Series: Depleted stocks with zero or very low catch advice. July 2025.

- Setting catch limits for depleted stocks in line with, i.e. not exceeding, scientific advice;
- Adopting and implementing effective rebuilding plans;
- Ensuring full catch documentation particularly where “bycatch TACs” are used; and
- Setting fishing opportunities for more abundant target stocks caught in mixed fisheries below their single-stock advice to safeguard depleted stocks caught in the same fishery.

There is no sustainable future or a competitive and resilient fisheries sector in wishful thinking and phantom recoveries.

### **The Western Mediterranean: Maintain momentum, avoid rollback**

Despite the adoption of a multiannual plan (MAP) for demersal stocks in 2019, including its legally binding objective to reach sustainable fishing mortality rates by 2025, overfishing persists.<sup>29</sup> Continued and strengthened implementation and enforcement are essential to reverse this situation. Prolonging overfishing erodes the very foundation of coastal communities’ future livelihoods.

A faster and more ambitious reduction in fishing mortality is needed. This must be achieved through a combination of fishing effort restrictions, improved gear selectivity, and closures of essential fish habitats to bottom trawling. These are not new recommendations, but their implementation is overdue.

The compensation mechanism was intended to support implementation of the MAP by allowing limited additional fishing days in exchange for equivalent conservation gains. However, its design, the choice of measures, and their enforcement remain opaque, with insufficient evidence that some of them are delivering the required reductions in fishing mortality. Without clear rules, transparency, and scientific justification, the mechanism risks undermining the MAP’s objectives.

We are strongly opposed to reopening the West Med MAP. Despite being only partially implemented and with 2025 marking the first year of its second phase, some Member States are already calling for its revision. Weakening the MAP now would undermine progress, contradict the objectives of the CFP, and reward delay and non-compliance.

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<sup>29</sup> See [Briefing 7](#) of 11 in our Joint Briefing Series: The fishing effort regime in the Western Mediterranean Sea. July 2025.

We call on the European Commission to:

- Oppose any revision of the West Med MAP and instead prioritise its full implementation;
- Ensure further reductions in fishing mortality in 2026, in line with the best available scientific advice;
- Strengthen the compensation mechanism by requiring transparency, clear reporting, science-based measures and effective enforcement of those measures;
- Support updated scientific assessments and socio-economic monitoring to track progress and guide future decisions.

### **Conclusion and Recommendations:**

In conclusion, the CFP remains a powerful and forward-looking policy instrument—but only if it is applied in full. Meanwhile, European fisheries management - including the setting of fishing opportunities - must also be geared towards delivering wider environmental objectives, such as GES requirements under the MSFD. A focus on MSY-based exploitation that fails to integrate sufficient precaution and safeguard ocean health is not enough to do so. The evidence shows that sustainable management benefits fish populations, marine ecosystems and the fleets that depend on them. We therefore urge the European Commission to take an ambitious approach in 2025 by proposing fishing opportunities for 2026 that:

- **Respect the law:** All fishing opportunities must be set in accordance with Article 2(2) of the CFP, which requires the restoration and maintenance of fish stocks above biomass levels capable of producing maximum sustainable yield, as well as the requirement to implement a precautionary and ecosystem-based approach, and to achieve GES. This means proposing and setting catch limits well below - and under no circumstances above - the best available single-stock advice by ICES, and eliminating unsustainable 'bycatch TACs' that prevent or delay stock recovery.

- **Invest in resilience:** Rebuilding overfished and depleted stocks must become a priority. This involves not only setting precautionary TACs well below the scientific single-stock advice 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. It also includes the development, monitoring and enforcement of effective rebuilding plans with clear recovery timelines, and the urgent commissioning of scientific advice to inform them.

- **Deliver socio-economic gains:** Thriving fish populations are the bedrock of a profitable and sustainable fishing industry. Ensuring long-term socio-economic viability means managing fisheries with foresight, protecting smaller-scale and low impact activities, and fostering energy efficiency and diversification.

- **Integrate ecosystem health:** Fisheries must be managed in the context of the broader marine environment. This entails adopting ecosystem-based management - underpinned by the relevant ecosystem-based scientific advice and additional precaution where this is not yet available -, reducing pressures on key prey species, and aligning fisheries decisions with biodiversity and climate objectives.

We remain at your disposal to support the Commission in this process and provide further information where needed.

List of supporting NGOs :

Baltic Salmon Fund

Baltic Salmon Rivers Association

BalticWaters

BirdLife Europe

BlueMarineFoundation

Coalition Clean Baltic

ClientEarth

Danmarks Naturfredningsforening

Deutsche Stiftung Meeresschutz (DSM)

DUH e.V.

Ecologistas en Acción

FishSec

Irish Wildlife Trust

Marine Conservation Society

North Sea Foundation

Oceana

Sciaena

Seas At Risk

SFACT

SharkProject

SharkTrust

SUNCE

WDC

WWF

Zero