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Topic: Call to reform the agreement with ICES to provide recovery-focused, ecosystem-based scientific advice for fisheries

Dear Commissioner,

Since we wrote to you in May on the need to reform the current agreement with ICES, the need for an improved scientific basis for fisheries management has never been more apparent. As we have seen in the recent discussions on Baltic quotas, the interpretation of

ICES advice has become a key part of the negotiations while the need for rebuilding advice is long overdue.

With the Framework Partnership Agreement between the Commission and ICES due to expire next year and the upcoming discussions regarding the Annual Grant Agreement we see an opportunity to improve the basis upon which management takes its decisions and thereby implements the Common Fisheries Policy more successfully.

Biomass growth is a prerequisite for the success of the European fishing industry. During your tenure as Commissioner, we would encourage you to use your leadership to contribute to rebuilding our fish populations—ensuring not only more abundant stocks but also a healthier balance of older and larger individuals in our seas.

At present, the fishery managers are asking ICES the wrong questions and this is leading to counterproductive outcomes. Trying to manage all commercial stocks, using single-species models, at 100% of F_{msy} simultaneously is neither theoretically possible nor practically wise. This has to change.

In this letter we would like to highlight two practical recommendations that would improve the scientific advice in the immediate term. For a more detailed set of recommendations concerning the use of science in setting fishing opportunities we refer to the joint briefing: [“Best available” is not good enough - addressing shortcomings in the current scientific advice.](#)

1. Data quality

Accurate data is the cornerstone for good quality scientific advice. Modern techniques such as eDNA should be a mandatory control method for landings above 1 tonne. The technology is sufficiently developed to both ascertain the presence of species in mixed unsorted catches and can even provide accurate estimates of species composition. This is a cost-effective, transparent and non-invasive method which is more accurate and less expensive than REM technology and its implementation should be a priority.

In addition, we are particularly concerned by the exemption from the margin of tolerance in the Control Regulation for industrial vessels. This unfair policy harms the competitiveness of the small-scale fishing fleet and weakens the incentive to accurately record bycatch data, thereby reducing the quality of data available to scientists for their stock assessments.

2. Proxy values

While multispecies models, accurately accounting for natural mortality and developing new reference points, are attractive theoretical concepts, at present they are not fit for purpose. We will not, in the foreseeable future, be able to measure all interactions within an ecosystem and be able to understand their relative importance.

An immediate step that would help to reverse the widespread declines we see across European fishing stocks would be to use proxy values that mitigate risk and lay the foundations for biomass growth. These include capping the lowest biomass threshold level,

at which remedial measures would need to be taken, to 40% of B0. Further, fishing mortality for low level trophic species, or prey fish, should be limited to 0,3 - 0,5 Fmsy and for higher trophic level predators 0,5 - 0,8 Fmsy.¹ These revised thresholds would provide immediate benefits to the fishing industry while also contributing to biodiversity gains and improved ecosystem functioning.

On behalf of the Low Impact Fishers of Europe and all its member organisations I therefore respectfully urge you, dear Commissioner, to consider these proposals in your discussions with ICES on 4 November. We remain at your disposal for any needed clarification and we welcome your continued cooperation on this important topic.

Your sincerely,

A handwritten signature in blue ink that reads "Marta Cavallé". The signature is written in a cursive style and is underlined with a single horizontal line.

Marta Cavallé
Executive Secretary
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¹ Froese et al, 2025, **Systemic failure of European fisheries management** (ref. Supplementary materials section)