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Brussels, 08 of May 2025

Topic: Call to reform the agreement with ICES to provide scientific advice for fisheries management

Dear Commissioner,

The unique way in which the EU and ICES interprets and applies Maximum Sustainable Yield requires reform and improvement in order to reverse widespread stock decline, a decline in catches across European waters and a lack of growth, access and opportunity for the coastal and inshore fishing fleets. Key stocks such as mackerel and North Sea herring have in recent years had their recoveries choked off and been reduced by millions of tonnes, while in the

Baltic, catches have declined by 100.000 tonnes per year over the past decade while stocks are down by over 700.000 tonnes.

Higher biomass thresholds, integrating the need for population structures to have a proportion of older and larger individuals, improving natural mortality estimates and accounting for ecosystem dynamics are necessary for scientific advice to support the sustainable management of our fisheries, and **all of these should be integrated in the scientific advice for fisheries management.**

The CFP is clear on the need to restore and maintain populations of fish stocks above biomass levels capable of producing MSY. However, there's a **glaring incoherence between this policy goal and fishery management practice - which must be urgently addressed.** The way that scientific advice is provided must be revised and the management shortcomings that undermine fish stock growth and penalise low impact fishery methods dealt with.

In order to support a resilient, competitive and sustainable future for the sector, **growing fish stocks is a priority** and this has to be based on the best available science. At present, the advice provided by ICES gives no options that support stock growth. Across several high-value key stocks such as cod, turbot, herring and pollack the current advisory process has failed to result in successful management. Rather, potential recoveries have been choked off and benefits minimised.

The **most cost-effective way to support the growth in fishing opportunities for coastal communities is to reform the Agreement with ICES** so that science can provide the requisite advice and analysis to enable stocks to be grown. This means increasing the availability of fish in our seas, and of fish that are bigger and older. Bigger and older fish have more opportunities to spawn and also produce more offspring which survive better through to adulthood. For this to happen, it is vital that **BMSY becomes the standard reference point and target biomass used for stock management.** Developing new reference points, such as Feco, will not solve the core problem that fishing mortality needs to relate to a higher target biomass.

An **ecosystems approach should take account of predator/prey relationships**, sustaining marine trophic structures and the cumulative impacts of fishing on the wider ecosystem and the dynamics of multispecies commercial fisheries. The reformed Agreement should provide managers with further alternatives. At present, for many stocks, ICES provides no management alternatives between $F = 0$ and $F = F_{msy}$ range. It is necessary to move beyond single-species stock assessments which provide advice on a limited number of yield outputs if we are to implement fisheries policy based on the best available science. To this end, **the Agreement should specify that ICES provide a range of F values in between closing the fishery and the F_{msy} range.**

Our view is that fish stocks at lower trophic levels, i.e. prey species, should be fished at a maximum of 50% of F_{msy} in order to support adequate energy transfers throughout the ecosystem, improve stock resilience, ensure prey availability higher up the food chain and reduce the risk of stock collapse and fishery closure.

If we aim to maintain all stocks simultaneously at and around Bpa every year, the probability is that multiple stocks will collapse to below Blim levels every year. This has been observed over the past decade. **The Agreement must reduce the likelihood of this scenario repeating and ensure that we avoid the closure of targeted fisheries.**

How can we learn from good examples? In the Baltic there has been **one success story** during the past decade, herring from the Gulf of Riga. The stock was already in good shape and has increased by 50% while catches remain high. However, this growth was achieved by accident as fishing mortality had been overestimated and biomass underestimated. These high, steady catches from a good stock structure have been achieved in spite of the Agreement and the Baltic Management Plan rather than because of it. **We need a science-policy relationship that delivers good results by judgement rather than luck.**

We note that several scientists working within the ICES advice system have recently spoken critically against the current framework, highlighting that “*as the system stands today there are several significant shortcomings in the advice.*” In addition, they point out that **key factors such as the age structure of the fish stock, the range of local subpopulations and the role of a species in the ecosystem are being ignored. These important factors need to be included in the future Agreement.**

These statements from scientists are taken from a [documentary called “The fish we inherited” broadcasted on Swedish television, SVT, on 9 April 2025](#). A full translation of the statements is provided within the annex to this letter.

Reforming the Agreement is vital not only for the immediate interests of European fisheries, but it will also enable greater policy coherence between fisheries and the EUs environmental, economic and social commitments and responsibilities.

On behalf of the Low Impact Fishers of Europe and all its member organisations I therefore urge you, dear Commissioner, to consider these proposals when discussing the upcoming Agreement with ICES to provide scientific advice for fisheries management,

Your sincerely,

A handwritten signature in blue ink, reading "Marta Cavallé", with a horizontal line underneath the name.

Marta Cavallé
Executive Secretary
Low Impact Fishers of Europe

Annex: Extraction of captions from the documentary Mission review - The fish we inherited, Broadcasted on 9 April 2025.

The following excerpts come from 42.36 in the programme:

Narrator: Everyone – fishers, governments agencies and politicians point toward the scientists/researchers. But can we trust the scientist's advice?

Quotes with voice changed to an AI speaking English:

Scientist: *"As the system stands today there are several significant shortcomings in the advice we provide the basis for".*

Scientist: *"We are balancing on the brink of collapse. We should be much more cautious."*

Narrator: *"We have conversations with a group of researchers in and around the research institute ICES who are critical and concerned. In order to protect the anonymity of the scientists, who come from several different countries, we have replaced their voices with AI and allowed them all to speak English."*

Scientist: *"As a scientist you are under more pressure now it has become sensitive to speak out on this issue."*

Scientist: *"The debate about herring is extremely polarised. No matter what you do you end up in the crossfire."*

Narrator: *"They point toward the political requests that scientists should ignore central factors such as the age structure of the fish stock, that there are a range of local subpopulations and herring's central role in the ecosystem".*

Scientist: *"I don't really want to call it advice, it is more of a forecast with significant uncertainties where we also highlight risks and weaknesses in the information."*

Ends 44.32



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Ms Marta Cavallé
Executive Secretary
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Dear Ms Cavallé,

Thank you for your letter of 8 May 2025 calling for a modification of the Grant Agreement between the European Commission and the International Council for the Exploration of the Sea (ICES).

First, I would like to assure you that we share the same objective, namely, to improve the scientific advice for fisheries management and the associated advisory deliverables.

It is important to note that the award decision for the 2025 Grant Agreement with ICES was only recently signed, on 11 April. It aims at securing the scientific advice necessary for the effective implementation of the Common Fisheries Policy (CFP) Regulation¹.

I read with interest your specific proposals on how the agreement could in the future integrate new elements in the scientific advice to support the objectives of the CFP Regulation.

Your letter refers to several interesting elements, including the improvement of natural mortality estimates, the consideration of population structures and ecosystem dynamics, ecosystem considerations, as well as fish stock growth and reference points. While relevant work has been completed or is ongoing in these areas, proposals to amend the Grant Agreement require careful consideration given the broader context.

¹ Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.

Specifically, although the Commission continues to actively implement the principles of the CFP Regulation, many of the fish stocks for which scientific advice is sought from ICES are also fished by non-EU countries. These countries are also co-requesters of the advice, which introduces an additional layer of complexity when negotiating the terms of the Grant Agreement with ICES. Moreover, the difficulty consists in simultaneously addressing the different objectives of the CFP Regulation, in particular the maximum sustainable yield (MSY) objective and the ecosystem-based approach to fisheries management. In addition, any advice implementing the ecosystem-based approach must be based on the best available science, be actionable and in line with the precautionary approach to fisheries management.

Any improvement of the Grant Agreement should take these important considerations into account. However, the Commission remains open to discuss suggestions for the future improvement of the Grant Agreement. I would therefore invite you to share your suggestions with DG MARE services in the autumn and thus well in advance of the finalisation of the Grant Agreement for the following year. This could ideally take place in the context of the process initiated by DG MARE with the Advisory Councils.

Yours sincerely,



Costas Kadis