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Brussels, 30 October 2025

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 Fmsy 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,



Marta Cavallé

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



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Dear Ms Cavallé,

Thank you for your letter of 30 October 2025 concerning your call to reform the Grant Agreement with the International Council for the Exploration of the Sea (ICES) to provide recovery-focused, ecosystem-based scientific advice for fisheries.

Let me first welcome your engagement, as your letter aligns well with our objectives to strengthen the scientific advice for fisheries management.

Strengthening the scientific advice was a key topic I personally discussed with ICES during my meeting on 4 November 2025. ICES reassured me that with their vast and open network of scientists, it is doing everything possible to make the necessary improvement and new approaches technically feasible. It is worth recalling that during the Fisheries Council of 27-28 October, we agreed with Member States to ask ICES to include rebuilding scenarios in the annual catch advice for the Baltic Sea stocks.

With respect to the questions we pose to ICES, our requests for advice are formulated to implement the provisions of the existing legislation. Accordingly, it is this legal framework that guides the questions we submit.

Regarding your recommendation on data quality, we fully concur that the accuracy of data constitutes the cornerstone of robust scientific advice. My services are committed to ensuring

that all data are collected and maintained to the highest standards. Modern techniques, such as environmental DNA, can indeed be employed to identify the presence of species in mixed unsorted catches and estimate species composition. While such techniques are expected to offer substantial opportunities for expanding data collection - both in scope and quality - their use is still emerging and not yet part of standard data collection or fisheries control tools. Therefore, their integration will take time and will require significant resources. Any potential implementation should be pursued cautiously and in close collaboration with data requesters and end-users and, critically, with Member States.

In relation to the exemption from the margin of tolerance, I would like to reassure you that this is a carefully balanced provision within the Control Regulation, the implementation of which obeys to strict rules¹. It provides for some flexibility in logbook estimates, which is compensated by stringent weighing measures and control in listed ports to ensure the accuracy of catch registration. This derogation applies only to unsorted industrial pelagic and tropical tuna landings, without limitations on the size of vessels concerned. By strengthening the overall control system in listed ports, as they must meet higher standards, this will lead to more accurate and reliable catch data, and hence greater confidence in the information available to scientists.

Regarding the point you have made on the proxy values and alternative ecosystem-based fisheries management-compatible harvest control rules, I can assure you that this is being currently debated with ICES and other advice requesters. One of the core principles of ICES is that scientific advice must be based on the best available and credible science. This ensures that assessments, models, and proxies are robust, transparent, and widely accepted within the scientific community.

The Commission remains open to discuss further suggestions.

Yours sincerely,



Costas Kadis

¹ Commission Implementing Regulation (EU) 2024/1474 of 24 May 2024 laying down rules for the application of Article 14(4), point (a), of the Council Regulation (EC) No 1224/2009 as regards derogation from the margin of tolerance in estimating catches for unsorted landings and transshipments from small pelagic, industrial and tropical tuna purse seiners fisheries.