



EU pelagic industry position paper on fishing opportunities and Coastal States negotiations for pelagic stocks for 2025

MAIN POINTS

- **Crunch-time for strongly decreasing mackerel stock: EU action required now against other Coastal States' excessive, unjustified unilateral quota to avoid collapse of main EU pelagic fishery; full support for European Commission's legislative proposal on identifying and sanctioning non-EU countries allowing unsustainable fishing practices;**
- **Highest priority should be given to reaching agreement on all-party sharing arrangements for mackerel, blue whiting and Atlanto-Scandian herring, based on genuine historic track records and interest;**
- **Support for the TACs advised by ICES for mackerel (-22%, 576 958 tonnes), blue whiting (-5.4%, 1 447 054 tonnes), Atlanto-Scandian herring (+3%, 401 794 tonnes), North Sea herring (-22.5%, 412 383), western horse mackerel (75 545 tonnes, +488% of 2024 by-catch TAC), greater silversmelt (+7%, 18 966 tonnes) and boarfish (+40%, 38 925 tonnes);**
- **For North Sea horse mackerel (zero-catch advice), set a monitoring TAC to ensure continuation of data coming in for future stock assessment, and improve and expand surveys to include sufficient length distribution sampling data collection, including by the industry, through better-tailored fishing techniques;**
- **For North Sea herring, a stabilising mechanism for the TAC is desirable, in view of the huge year-to-year fluctuations.**

Coastal States / Northeast Atlantic mackerel

Total Allowable Catch (TAC)

With a heavy heart, the EU pelagic industry is of the opinion that the ICES advice of -22% (576 958 tonnes) should be followed. This downward trajectory appears unavoidable and is the result of the excess catches taken by all Coastal States except the EU (see below). For the stock biomass to remain above the $MSY_{Btrigger}$ threshold and to avoid an even more precautionary advice in 2026, more than ever catches will need to remain within the TAC. According to ICES, this could support recovery of the stock. The mackerel stock is naturally resilient, but the reckless overexploitation of the past few years has extremely weakened that resilience. As the EU industry pointed out last year, 'hindcast' research shows that were it not for the overshoot on the basis of excessive, unjustified unilateral quotas set by other Parties, managers would now be in a position to increase the TAC. Action against this behaviour is needed without delay, as the stock is now in a crisis situation and the most important EU pelagic fishery is at risk of being decimated.

The EU pelagic industry welcomes the upcoming benchmark procedure for the current assessment methodology. We have argued previously that the assessment could be improved, particularly by expanding geographic coverage and by considering additional data sources, including from the industry.

The EU industry highlights that ICES in its advice for 2024 concluded that, contrary to previous scientific perceptions, there is only one mackerel stock component, not three. This constitutes



a major change in the perception of the stock and for how it should be managed in EU waters and beyond. The EU management regime for mackerel was designed based on three stock components, including a weaker component in the southern North Sea. This is no longer a valid approach. The industry recommends that the Commission updates existing legislation accordingly and secures coherence as regards conservation measures such as minimum conservation reference sizes, and removes obsolete special conditions in the TAC and Quota Regulation for fishing opportunities in areas 3 and 4 put in place to protect a component of the mackerel stock that according to ICES does not exist.

Finally, the industry supports all other recommendations by the Pelagic Advisory Council (PelAC) for this stock.

Joint management and sharing arrangement

The real problem for the mackerel stock is not that the TAC has or has not been set in line with scientific advice; it has been for years. At the heart of the issue lies the overfishing by several Parties based on the setting of excessive, unjustified unilateral quotas, in the absence of a comprehensive sharing arrangement between all Coastal States. This adversely impacts the fishing opportunities and market position of EU fishers.

The EU pelagic industry welcomes the Commission and the Council's condemnation of this irresponsible behaviour and repeats its call to take immediate action. The pelagic industry urges the EU institutions to make use of the instruments at their disposal, such as select trade measures, using the EU's power as the main market for the other Coastal States' seafood exports. The industry is fully supportive of the recent legislative proposal from the Commission¹ that would expand the EU's toolbox to address unsustainable fishing practices by non-EU countries. It should help reinforce the process of cooperation, while ultimately countries identified as allowing said practices can ultimately be sanctioned (e.g. through an import ban). The industry urges the Council and the European Parliament to deal with the proposal without delay.

The industry is highly appreciative of the efforts by the Commission through its High Level Dialogue with Norway, which elevates fisheries' importance within the broader EU-Norway relationship. This allows links between topics (such as trade) to be made much more apparent and gives more visibility to Member States and stakeholders in both countries of how cooperation in fisheries differs in other areas.

We are deeply disappointed with the partial agreement reached in June between the UK, Norway and the Faroe Islands. This agreement rewards the setting of excessive, inflated unilateral quotas by some Parties in recent years. Therefore, the EU industry urges all Coastal States to continue consultations on a comprehensive sharing arrangement that should reflect genuine, sustainable historic track records and interests. The current overfishing should not be accepted to count towards an increased fishing track record for those Parties concerned. We commend the Commission for its strong efforts to have all Parties engage in earnest and in good faith. The industry does not favour a package approach for a sharing arrangement and reciprocal access for all three pelagic stocks under the remit of the Coastal States. However, it very much

¹ [Press release: Commission proposes a revision of EU tools to address unsustainable fishing practices by non-EU countries on fish stocks of common interest](#)



supports the EU's work on improving cooperation with other Parties, including through fisheries framework agreements, and considering all three negotiations while doing so.

The trilateral agreement and supporting bilateral agreements² between the UK, Norway and the Faroe Islands does not stop overfishing. The three parties invite the other Coastal States to join the agreement, but the remaining portion is utterly incompatible with historic shares, recent track records and genuine economic interest. This deal legitimises continuous overfishing by some based on excessive, inflated unilateral quotas that stray far from the shares applicable under the last sharing arrangement. For example, the Norwegian share is almost 38% higher than in 2014-2018. Sadly, the UK has swapped in 'stolen goods', namely part of the artificially increased Norwegian mackerel quota, for the second year in a row, in exchange for Norwegian access to UK waters. This leaves the EU as the only Coastal State showing restraint through sticking to the previous sharing arrangement. Nonetheless, the EU should continue to work constructively with the UK, reflecting the ties between the EU and the UK through their Trade and Cooperation Agreement (TCA).

The EU pelagic industry calls on the Commission and the Council to stick firmly to the position that a flawed, one-dimensional concept of zonal attachment, advocated by Parties such as Norway, Faroe Islands and the UK, cannot serve as the basis for a sharing arrangement. Instead track records should be respected, with a view to providing continuity, stability and predictability. As we noted previously³, there are too many caveats, gaps and uncertainties in the data on geographical distribution of the mackerel stock in the Northeast Atlantic. Evidence shows varying and very different migratory patterns, including mackerel retreating from Norwegian waters.

In terms of geographic distribution, it is clear the stock has contracted. This is another strong indication of a stock decreasing and in distress. Given this pattern, the access offered by the UK to Norway is a double whammy, leading to intense fishing effort on a contracting stock which would otherwise not be the case.

In a repetition of last year and to attempt to justify their unwarranted unilateral quota, the Faroe Islands have been fishing mackerel on the summer feeding grounds in the international zone, when the fish are in poor condition after the spawning migration. In international waters, mackerel are scattered across a wide area which means long trawling times, high bycatch and high fuel use for small catches. Significant proportions of Faroese, but also Icelandic and Norwegian mackerel catches are estimated to have been turned into fishmeal and -oil. This is a wasteful practice that will have a long-lasting and damaging effect on the mackerel stock. Large increases in fishing effort by the Russian Federation, leading to significant unreported and unregulated catches, has also added to the decline in the stock.

² [EAPO/Europêche press release on mackerel partial agreements UK-Norway-Faroe Islands](#)

³ [EAPO position paper on Coastal States mackerel distribution report and consultations \(16 March 2022\)](#)



Coastal States / Blue whiting

Total Allowable Catch (TAC)

The EU pelagic industry supports the ICES advice of a TAC of 1 447 054 tonnes (-5.4% compared to the advice for 2024) as well as all other recommendations by the PelAC for this stock. As expected, the impact of the recruitment peak from 2021 and 2022 has now waned and spawning stock biomass has reduced from one of the highest levels ever. This natural cycle will normally recur, but there is a risk of it being disturbed by the continuing excess catches by some Coastal States. Better management would allow a large proportion of the stock to grow larger, which would benefit the fishery for human consumption. The bycatch of other species, in particular hake, from non-EU vessels operating in EU waters requires additional monitoring. Indications from EU fishers are that bycatch of hake in the blue whiting fishery have increased significantly.

Joint management and sharing arrangement

The EU pelagic industry notes that consultations on a sharing arrangement are still ongoing, albeit with seemingly very little drive and political will. Any sharing arrangement should reflect the EU's genuine and traditional interest and track record as the biggest player in this fishery since its initial development, also considering the fact that its historic catches have been hampered by quota and access given to Norway through the annual bilateral EU-Norway agreement (with Norway gaining a better track record in the process).

If no sharing arrangement is reached, there is only one alternative in the industry's view and that is the continuation of a joint EU-UK share of 41.42% of the TAC (subsequently allocated between EU and UK based on the Trade and Cooperation Agreement), which has been in place for the past 8 years.

As with mackerel, zonal attachment should not be the criterion on which to base a sharing arrangement. Data on geographical distribution is incomplete and inconsistent and therefore does not allow for clear conclusions to be drawn. The use of zonal attachment by other Parties is flawed and one-dimensional.

The industry does not favour a package approach for a sharing arrangement and reciprocal access for all three pelagic stocks under the remit of the Coastal States. However, it very much supports the EU's work on improving cooperation with other Parties, including through fisheries framework agreements, and considering all three negotiations while doing so.

New access for Norwegian vessels to parts of EU waters should not be considered and only be offered in exchange for payment in fish. Account can also be taken regarding the level of the quota transfers. Payment should also be required for access to EU waters going beyond the level established pre-Brexit.



Coastal States / Atlanto-Scandian herring

Total Allowable Catch (TAC)

The EU pelagic industry is happy to see that the perception of this stock has changed after a few years of decline. ICES has advised a TAC of 401 974 tonnes based on the management plan, representing an increase of 3% from 2024. The industry supports the advised TAC and all other recommendations made by the PelAC.

As with mackerel and blue whiting, substantial overshoots of the fishing opportunities remain cause for significant concern and those responsible should be actively pressed to change their behaviour and fish within their quotas.

Joint management and sharing arrangement

The EU pelagic industry notes that consultations on a sharing arrangement are still ongoing. The EU has a consistent and predictable track record in terms of quota setting and catches for this stock, with a genuine and traditional interest underlined by the fact that it regularly increases its quota through international swaps. It therefore has a legitimate right to the share it currently claims based on previous arrangements and the presence of Atlanto-Scandian herring in its waters. Attempts by Norway and the Faroe Islands to push through a (partial) agreement which excludes the EU are reprehensible and should be rebuked in the highest terms.

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In case full access to the stock for the EU in Norwegian waters is not restored (see under 'EU-Norway'), the EU share should be increased by the percentage with which the EU paid for said access in 2007 or, in the absence of a sharing arrangement, be paid back by Norway in quota.

The industry does not favour a package approach for a sharing arrangement and reciprocal access for all three pelagic stocks under the remit of the Coastal States. However, it very much supports the EU's work on improving cooperation with other Parties, including through fisheries framework agreements, and considering all three negotiations while doing so.

EU-UK-Norway / North Sea herring

The EU pelagic industry recommends following the ICES advice of a TAC of 412 383 tonnes, based on the MSY approach in absence of a long-term management strategy agreed among the three Coastal States concerned. The pelagic industry also supports the recommendations of the PelAC. The advised TAC represents a 22.5% decrease compared to the previous advice, mainly due to a downward revision of the 2022-year class.

The highly unstable TAC for North Sea herring remains a big issue for fishers. The last four years have produced advice going from +45% down to -22%, back up again to +28% and now -22.5%. In the view of the industry, it remains very important that ICES and the managing Coastal States explore methods that allow for more stable TACs to be set for this stock. The industry once again urges the EU, the UK and Norway to work together on a long-term management strategy considering all factors impacting stock (spawning) dynamics, including those related to climate,



the ecosystem and other economic uses of the relevant areas. The industry notes that the Parties have postponed those discussions to next year but feels that work on the management strategy should take precedence over other elements such as amending the fleet management structure. For select parts of the EU fleet, the current set-up of A-, B-, C- and D-fleets corresponding to combinations of areas and targeted fisheries, or by-catch is essential for careful management of the stock.

The industry would like special attention to be given to ICES's advice that no activities that have a negative impact on spawning habitats, such as extraction of gravel and building of wind farms, should be allowed unless the effects of these activities have been assessed and shown to be non-detrimental. Gravel substratum is an essential habitat for herring spawning in autumn and these non-fisheries forms of spawning habitat degradation may decrease the early life-stage survival of herring. More research is needed to better assess the effects on the herring stock and recruitment of the greatly increasing abundance of windfarms, as well as predator populations. This goes for other pelagic stocks as well.

EU-UK / Western horse mackerel

The EU pelagic industry wholeheartedly supports the ICES advice for this stock of 75 545 tonnes based on the MSY approach. After two years of zero-catch advice leading to small by-catch TACs, this is a highly welcome development. It is also somewhat of a vindication of the industry's recent position that recruitment has improved and the estimated spawning biomass is substantial enough to allow a targeted fishery, and moreover seemed to be underestimated ongoing genetic research.

The 2024 benchmark of the horse mackerel stocks assessment model has addressed data gaps and recruitment calculation, among other things. The benchmark procedure has allowed the western, southern and North Sea horse mackerel (as well as boarfish) stocks to move to Category 1 stock assessments. More data and additional surveys should ultimately strengthen the management. The industry specifically advocates the continuation of ongoing horse mackerel genetic stock-ID research, to which it heavily contributes. EAPO notes there is a five-year research plan proposed in the benchmark report. This should be initiated as soon as possible.

EU-UK / North Sea horse mackerel

Whereas the state of the western horse mackerel stock has improved, the North Sea horse mackerel fishery now faces the same situation as western horse mackerel in the past two years with ICES advising zero-catch. This advice is based on questionable survey data.

The possibility of a fishery closure is of great concern to the industry. A continued prohibition of targeted catches will not only jeopardise the long-term future of this fishery but also impact the viability of those fisheries taking place in conjunction, around the same fishing grounds.

There is an urgent need for more and better data, as illustrated by the fact that the survey feeding into the assessment is a bottom-trawl survey, which is not designed to target horse mackerel and shows low catchability. That means that additional sampling data is required to improve the advice for management of the stock; the industry stands ready to assist in its



collection, naturally offering the right fishing technique for this purpose. As mentioned above, the industry also stresses the importance of the continuation of horse mackerel genetic stock-ID research, to which it heavily contributes. There is evidence of mixing between the western and North Sea stocks in the English Channel (divisions 7d and 7e).

Considering the above, it is of the utmost importance to avoid a zero-catch TAC, as this would mean a full stop of necessary data for stock assessment purposes coming in and the stock potentially dropping out of Category 1 (full) stock assessment right after it attained that status.

Therefore, the industry proposes a monitoring TAC of up to 1200 tonnes, which is in line with ICES's WGWIDE report for this stock and which would deliver the minimum number of samples required to sample the length distribution of the stock. Through a fishing mortality of 0.033, this would lead to an increase (by 3.6%) of the spawning stock biomass in 2025 of only 194 tonnes less than under a zero-catch scenario (59 039 versus 59 233 tonnes). Any monitoring TAC should be set in conjunction with a sampling plan that considers the need for comprehensive spatial and temporal sampling coverage of the stock and the continuing need to genetically analyse commercial catches in addition to survey samples.

Should the EU and the UK in the end agree to set a bycatch TAC, as in 2023 and 2024 in the case of western horse mackerel, it is imperative that the Commission and the Council ensure coordination and harmonisation of its implementation. In 2023 and 2024, the decision led to unforeseen practical issues in the implementation by Member States, jeopardising the level playing field. EAPO⁴ and the PelAC⁵ addressed these issues in previous letters to the Commission.

EU-UK / Greater silversmelt

The EU pelagic industry can support the ICES advice of 18 966 tonnes based on the MSY approach (+7% compared to the previous advice), as well as the recommendations by the PelAC and the NWWAC. Since 2016, unilateral quotas have been set by the Faroe Islands and EU/UK separately, and the sum exceeds the recommended catches. However, even though since 2022 actual catches have remained below the sum of unilateral quotas, the industry calls on the EU Commission and the Council to reach an agreement on the sharing of this stock to prevent overfishing.

EU-UK / Boarfish

The boarfish stock assessment was benchmarked by ICES in 2024, and a new Category 1 assessment developed. ICES had previously issued two-year advice for 2024 and 2025 but following the benchmark has revised this and issued new catch advice for 2025: catches of no more than 38 295 tonnes, representing a 40% increase on 2024. The EU pelagic industry supports the ICES advice.

The stock has increased significantly since 2019, and the spawning stock biomass is now approximately twice that of during the peak of the pre-management fishery in 2010. The fishing level is set low relative to the stock size as the recruitment is defined as spasmodic, which means that episodes of strong recruitment are infrequent and irregularly occurring. Further research is

⁴ [EAPO Letter: The EU Commission's 'Bycatch Only' Rule \(22 March 2023\)](#)

⁵ [PelAC recommendation on harmonising the implementation of the bycatch TAC for Western horse mackerel \(7 July 2023\)](#)



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needed to better understand the drivers of recruitment in boarfish. With the stock increasing, it is also important that cognisance is taken of likely increases in bycatch of boarfish that may result. Such bycatch has the possibility of 'choking' both demersal and pelagic fisheries under the landing obligation.

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