

## EU pelagic industry position paper on fishing opportunities and Coastal States negotiations for pelagic stocks for 2026

### MAIN POINTS

- A dire year ahead for EU pelagic fishers: mackerel, blue whiting and North Sea herring fishing opportunities all falling significantly due to external or natural factors.
- No sharing arrangements, no fish – this is now close to reality for mackerel fishers. Highest priority should be given to reaching agreement on comprehensive sharing arrangements for mackerel, blue whiting and Atlanto-Scandian herring, based on genuine historic track records and interest. Targeted EU market actions against excessive, unjustified unilateral quotas to avoid the collapse of the main EU pelagic fishery are overdue and critical.
- Support for an emergency sharing arrangement for mackerel, which should then be derived from the previous sharing arrangement and additionally include provisions to limit catches in international waters and to ensure these are accounted for.
- Support for the TACs advised by ICES for mackerel (-70%, 174 357 tonnes), Atlanto-Scandian herring (+33%, 533 914 tonnes), western horse mackerel (-1.8%, 74 214 tonnes) and greater silversmelt (-2.8%, 18 441 tonnes).
- If the mackerel TAC is set in line with the ICES advice, EU catches in 2026 will still be scientifically responsible, as will selling, buying and eating that catch; this should be actively communicated by the EU, its Member States and stakeholders.
- ICES assessment for blue whiting (-41%, 851 344 tonnes) shows an impactful imperfection; call for blue whiting TAC decrease to be capped at 20%, in the context of the long-term management strategy.
- ICES assessment for boarfish (-22%, 29 720 tonnes) is driven by a single data point and does not reflect the reality on the fishing grounds; call for a review of the survey data and the possibility of an in-year revision to the advice.
- For North Sea horse mackerel (zero-catch advice by ICES), follow the advice, but also establish a rebuilding plan and, crucially, set a monitoring TAC to ensure continuation of data coming in for future stock assessment, including from the industry, through the most suitable fishing techniques.
- For North Sea herring, managers are urged to establish a long-term management strategy that limits interannual variability of the TAC and limits sustainability risks to the stock. Industry position on TAC to be taken after upcoming publication of further ICES advice on long-term management scenarios.

### General

The EU pelagic industry is facing a perfect storm in 2026, with huge TAC cuts on the horizon for many important stocks. A cocktail of unfortunate natural factors, imperfect scientific assessments and irresponsible behaviour by other Coastal States will bring fishers and other parts of the fish value chain into great trouble. While the industry considers it essential to base stock management decisions on the best available science, we also explicitly ask decision-makers to fulfil their duties to take into account socio-economic impact.

In addition to the positions taken below, the EU pelagic industry supports the recommendations by the Pelagic Advisory Council (PelAC) for these stocks.

## Coastal States / Northeast Atlantic mackerel

### Total Allowable Catch (TAC)

The loudest alarm bells yet are sounding for the mackerel stock, which has plummeted below critical spawning biomass levels ( $B_{lim}$ ). As a result of excess catches by all Coastal States except the EU (see below), EU fishers' biggest fears are becoming reality in front of their eyes. Their lifeline is now a mere 174 357 tonnes advised by ICES for the 2026 TAC (of which around a fifth will be available to the EU fleet); this is a 70% decrease. A zero-catch scenario has been avoided thanks to the sufficient probability of the stock recovering to above  $B_{lim}$  in 2027, which will of course depend on the advice being respected in practice.

In the interest of the stock and our own future as mackerel fishers, the industry sees no other option than following the ICES advice. The mackerel stock has hit the limits of its natural resilience after the reckless overexploitation of the past few years, although apparent abundance in the southern part of the North Sea, which is not covered by any survey, offers a glimmer of hope. As the EU industry already pointed out in 2023, 'hindcast' research shows that were it not for the overshoot based on excessive, unjustified unilateral quotas set by other Parties, managers would now be able to increase the TAC. The EU continues to pay the price for the longstanding overfishing - up to 40% - by others. Action against this irresponsible behaviour is needed without delay, as the most important and valuable EU pelagic fishery is at risk of being wiped out. The industry considers it appropriate to formally request an urgent STECF economic evaluation and also pursue support for resilience and retention of the EU fleet in proportion to said lost fishing opportunities.

If the TAC is set in line with scientific advice, and catches in 2026 can as such still be scientifically responsible, it is of utmost importance that the European Commission and the EU Member States, together with the industry, explain to the general public why catching, selling, buying and eating mackerel from EU fishers are still responsible things to do. Even when the stock was still above critical and precautionary limits, in 2025, operators in several Member States were confronted with retailers stopping their sourcing. These retailers based their decisions on the premature 'red-listing' of EU mackerel for human consumption by Fish Guides that follow a biased interpretation of the available science, differing substantially from the accepted ICES methodology.<sup>1</sup> Following the publication of the ICES advice for 2026, some NGO's as well as the Marine Stewardship Council (MSC) have also called on EU retailers and consumers to stop selling and buying mackerel. The EU pelagic industry urges these organisations to repeal those calls, as these do nothing to expedite a solution to the Coastal States consultations while doing serious damage to the fish value chain of the only Coastal State acting responsibly: the EU. In addition, the industry again asks stakeholders such as MSC and the North Atlantic Pelagic Advocacy Group (NAPA) to clearly differentiate between the impact on the mackerel stock of the EU fleet and that of other fleets.

The EU industry highlights that according to ICES, 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

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<sup>1</sup> [EAPO/Europêche press release on red-listing EU mackerel for human consumption](#)

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. This recommendation is without prejudice to the preexisting relative stability keys and historical entitlements for the three components.

#### 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 systematic setting of excessive, unjustified unilateral quotas, in the absence of a comprehensive sharing arrangement between all Coastal States and despite evidence of impact on the stock biomass. This adversely impacts the fishing opportunities and market position of EU fishers. The industry is highly appreciative of the efforts by the European Commission in the consultations themselves, for its condemnation of certain Coastal States' irresponsible behaviour and through its high-level contacts with Norway and others.

The EU pelagic industry urges all involved to finally reach a pragmatic conclusion on a sharing arrangement, at the latest by early 2026. The industry would support an interim emergency arrangement for 2026 inspired by the allocation key of the previous sharing arrangement, in order to boost the stock's chances of recovering above  $B_{lim}$ . Both an emergency arrangement and a definitive one should include provisions to limit catches in international waters and to take those catches fully into account towards utilisation of each Coastal State's quota.

All the pressure possible needs to be put on those working against a successful, comprehensive outcome. This includes exploring higher-level (political) negotiations and independent arbitration and considering in earnest the Fishery Improvement Programme by the North Atlantic Pelagic Advocacy Group (NAPA, also for blue whiting and Atlanto-Scandian herring), which includes the potential end of sourcing by major retailers and processors in the course of 2026 in the absence of sharing arrangements. It also includes at long last putting to use the EU's power as the main market for the other Coastal States' seafood exports, concretely through the revamped and improved 'EU Regulation on certain measures for the purpose of the conservation of fish stocks in relation to countries allowing non-sustainable fishing'.

Any comprehensive sharing arrangement 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. To reiterate, the trilateral agreement and supporting bilateral agreements<sup>2</sup> between the UK, Norway and the Faroe Islands do not stop overfishing. 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, while the remaining portion is utterly incompatible with historic shares, recent track records and genuine economic interest of others. The EU is now the only remaining Coastal State showing restraint through sticking to the previous sharing arrangement.

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<sup>2</sup> [EAPO/Europêche press release on mackerel partial agreements UK-Norway-Faroe Islands \(26 June 2024\)](#)

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 previously<sup>3</sup>, 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 even further. When there are fewer mackerel, they travel less far. This is another strong indication of a decrease in the stock and a stock 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.

Sadly, to justify their unwarranted unilateral quota, some Coastal States also keep allowing to fish 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 portions of especially Icelandic 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, have also added to the decline in the stock. The EU pelagic industry considers it essential to set specific catch limitations in international waters, which should then also be accounted for.

### **Coastal States / Blue whiting**

#### **Total Allowable Catch (TAC)**

The EU pelagic industry takes note of the ICES advice of a TAC of 851 344 tonnes (-41% compared to the advice for 2025). Data from the fishery itself, while confirming that the stock is shrinking as expected as part of its natural cycle, shows a catch success rate that has fallen around 10%. The biomass assessment would appear to have been unevenly influenced by the fact that the single survey for this stock was executed in very bad weather, causing the fish to be widely dispersed and much more difficult to find than fishers have experienced in better conditions.

The stabilisation mechanism of the long-term management plan in place for this stock dictates that any advice between -20% and -40% is capped to -20%. The unfortunate execution of the survey therefore has a huge impact on the advice, slipping by 20 percent points. Even if the survey outcome had been just slightly off-kilter, the 40% threshold would not have been passed. Having weighed all these elements, the industry advocates a TAC that is 20% lower than the advice (and TAC) for 2025, translating into a TAC of 1 157 643. In the long run, it is imperative to expand data collection for this stock assessment. The 2026 benchmark should address this in-depth.

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

The industry warns that a return to the upward slope of the natural cycle runs a risk of 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.

#### Joint management and sharing arrangement

The EU pelagic industry urges all parties involved to finally reach a conclusion on a sharing arrangement by early 2026. The industry welcomes the somewhat renewed spirit in these negotiations, driven by the political will of the current chair for this stock (the EU). 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 very much supports the EU's work on improving cooperation with other Parties to the benefit of blue whiting management, including through fisheries framework agreements.

New access for Norwegian vessels to parts of EU waters should not be considered and only be offered in exchange for payment in fish. It should also be conditional on a successful conclusion of relevant Coastal States sharing arrangements. Account can be taken as well 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 encouraged by the recent upward trajectory of the advice. Surveys indicate two strong year classes (2021, 2022) which make a positive impact on biomass assessment and the probability of rising above the  $MSY_{Btrigger}$  level in the very near future. After a 3% increase for 2025, ICES has now advised a TAC of 533 914 tonnes based on the long-term management strategy in place, representing an increase of 33% from 2025. 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. Those responsible should be actively pressed to change their behaviour and fish within their quotas.



#### Joint management and sharing arrangement

The EU pelagic industry urges all parties involved to finally reach a conclusion on a sharing arrangement by early 2026. 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.

As with mackerel and blue whiting, 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.

In case full access for the EU to the stock in Norwegian waters is not restored through the annual bilateral consultations, 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 very much supports the EU's work on improving cooperation with other Parties to the benefit of Atlanto-Scandian herring management, including through fisheries framework agreements.

#### **EU-UK-Norway / North Sea herring**

The EU pelagic industry takes note of the ICES advice from May 2025 to set a TAC of 287 772 tonnes (-30.2%), based on the MSY approach in absence of a long-term management strategy agreed among the three Coastal States concerned. Coming on top of last year's cut of 22.5%, this would be a major blow for herring fishers. The industry is also aware that, at the request of those managers, further ICES advice for this stock is forthcoming based on possible long-term management strategy scenarios<sup>4</sup> that essentially would limit interannual variability and the risk of the stock falling below  $B_{lim}$ . The pursuit of such a strategy, which should be established without delay, is in line with previous calls from the industry, which therefore awaits advice before taking a position on the TAC setting for this stock for 2026.

The industry supports the recent recommendations by the PelAC with a view to improving the North Sea herring assessment<sup>5</sup> and again urges the EU, the UK and Norway to establish 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. These efforts 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.

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<sup>4</sup> [ICES advice in response to joint request \(EU-UK-NO\) on a long-term management strategy for North Sea autumn-spawning herring](#)

<sup>5</sup> [PelAC recommendations on herring for 2026 \(14 July 2025\)](#)



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. As for other pelagic stocks, there is a continuous need for more research to better assess the effects on the herring stock and recruitment of the greatly increasing abundance of windfarms, as well as predator populations. However, it should also be explored whether, after years of gathering evidence, there is enough data available now to make such assessments already.

### EU-UK / Western horse mackerel

The EU pelagic industry supports the ICES advice for this stock of 74 214 tonnes based on the MSY approach, representing a 1.8% decrease which is mainly due to retrospective adjustment of recruitment assumptions.

As last year, and although this is still a relatively data-limited stock despite its move to a Category 1 stock assessment, there are signs that recruitment is improving. The stock has stabilised, and the estimated spawning biomass is substantial enough to allow a targeted fishery. The newer year classes may have a strongly positive impact on the state of this stock in the upcoming years.

A significant issue with the current ICES assessment is the lack of a targeted survey for western horse mackerel. Instead, the assessment relies on trends from several non-specific acoustic surveys to track the biomass of the stock. The development of a dedicated acoustic survey conducted at the appropriate time of year would strengthen the basis of the assessment and ultimately management. The industry specifically advocates the continuation of ongoing horse mackerel genetic stock-ID research, which has demonstrated that the current assessment area of the western horse mackerel stock is not correctly delineated. All evidence indicates that the stock extends into ICES Area 9.a and this is not currently accounted for in the assessment. Recommendations for both the dedicated acoustic survey and expansion of the genetic stock identification were included, along with several others, in the long-term research plan for horse mackerel in the ICES WKBHMB 2024 report<sup>6</sup>. To date little progress has been made by ICES or the member states in implementing the research plan. Failure to do so will prevent further development of the stock assessment and management.

The EU industry would like to draw attention to the longstanding and unresolved issue of the western horse mackerel TAC currently covering not just western horse mackerel (*Trachurus trachurus*) but mixed catches of *Trachurus* species, including *T. picturatus* (blue jack mackerel), and *T. mediterraneus* (Mediterranean horse mackerel). This combined TAC prevents effective control of single-species exploitation rates and results in unnecessary underexploitation of *T. trachurus*.

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<sup>6</sup> [ICES WKBHMB 2024 report](#)

### **EU-UK / North Sea horse mackerel**

For the second year in a row, ICES advises zero catch for this stock. In 2025, the de facto fishery closure – only a small bycatch TAC was agreed between EU and UK – has had a clear impact on the EU fleet, with vessels being tied up for lack of quota. A long-term prohibition of targeted catches will not only jeopardise the future of this fishery but also impact the viability of those fisheries taking place in conjunction, around the same fishing grounds. The industry therefore welcomes the intent of the managers to construct a rebuilding plan.

The EU pelagic industry accepts that with biomass being perceived as significantly below  $B_{lim}$ , a commercial targeted fishery is not in the cards for the next calendar year. However, especially in the absence of such a rebuilding plan, it is crucial that an adequate monitoring TAC is put in place for 2026. Managers have a responsibility to avoid a full stop of necessary data for stock assessment purposes coming in and the stock potentially dropping out of Category 1 (full) stock assessment.

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. Relying on largely demersal bycatch (quota) for data has the same shortcoming.

That means that additional sampling data is required to improve the advice for management of the stock; the pelagic 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). 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.

Should the EU and the UK in the end agree to set a bycatch TAC, as for 2025 for this stock and in 2023 and 2024 for western horse mackerel, it is imperative that the Commission and the Council ensure coordination and harmonisation of its implementation. The setting of bycatch TACs led to unforeseen practical issues in the implementation by Member States, jeopardising the level playing field. EAPO<sup>7</sup> and the PelAC<sup>8,9</sup> addressed these issues in previous letters to the European Commission.

### **EU-UK / Greater silversmelt**

The EU pelagic industry can support the ICES advice of 18 441 tonnes based on the MSY approach (-2.8% 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. Without exception the sum of unilateral quotas exceeds the recommended catches, although at least in most cases catches have subsequently remained below that sum. The

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<sup>7</sup> [EAPO Letter: The EU Commission's 'Bycatch Only' Rule \(22 March 2023\)](#)

<sup>8</sup> [PelAC recommendation on harmonising the implementation of the bycatch TAC for Western horse mackerel \(7 July 2023\)](#)

<sup>9</sup> [PelAC letter on a North Sea horse mackerel monitoring TAC \(27 March 2025\)](#)





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 EU pelagic industry struggles to understand the purported decline in SSB indicated by the ICES assessment, leading to 22% decrease in advice for 2026 (29 720 tonnes). The industry notes that the boarfish stock has increased significantly since 2019, and the spawning stock biomass of this long-lived species is now approximately twice that of during the peak of the pre-management fishery in 2010. This is corroborated by experience on the fishing grounds, indicating that the stock is not yet on the downward slope of its historical cycle. Boarfish is now a common bycatch in the mackerel and western horse mackerel fisheries to the west and northwest of Ireland, supporting the view that the distribution of this stock is expanding, which is as an indicator of an increase in the biomass.

The ICES assessment appears to be driven by the single 2025 acoustic survey data point, which was 36% (158 000 tonnes) lower than the 2024 estimate. This level of decline is not supported by the recent catches from the stock and contradicts the other indices in the assessment, which indicated an increase in biomass. The analysis of the 2025 acoustic survey showed a decrease in the density of boarfish shoals, indicating a possible year effect in the survey. Though the survey was retained in the assessment as a valid data point, we ask that the raw survey data are rescrutinised to ensure that no errors have been made. If significant differences are found in the 2025 acoustic survey data, then the assessment and advice should be updated. We also ask that the Commission and ICES retain the possibility of an in-year revision to the advice and TAC should the 2026 acoustic survey data point be at a 'normal' level, thus confirming that 2025 survey data point was an anomaly. The revised advice would enable additional fishing opportunities to become available in Q4 of 2026.

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 needed to better understand the drivers of recruitment in boarfish. Ireland is planning to carry out this research in the coming years.

Boarfish being an unavoidable bycatch in the western horse mackerel fishery, a significantly lower quota combined with a stable western horse mackerel quota signals a choke hazard for the latter for some Member States and fleets. Similar issues may occur for other (demersal) stocks under the landing obligation.

*EAPO-NPWG / 3 October 2025*

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