European Association of Fish Producers Organisations

Association Européenne des Organisations de Producteurs dans le secteur de la pêche

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EAPO position paper on the Southern Western Waters fishing opportunities for 2026

General comments

If at the EU level we acknowledge progress in achieving sustainable fishing, we can observe a deterioration for numerous resources in the Southern Western Waters. This continuous downward trend highlights the impact of climate change in the area, as mentioned in the Commission's communication: Sustainable fishing in the EU: state of play and orientations for 2026. This has been accompanied by a drastic decline in fishing opportunities over the past several years, raising fears of the worst in economic and social terms for fishing communities.

The above-mentioned Commission's Communication highlights the Bay of Biscay and Iberian waters as having the most important upward trend in terms of biomass since 2003. However, the exploitation perspectives are not at all aligned when looking at fishing opportunities.

Despite complying the best with the requirement of the CFP to fish stocks at FMSY, below FMSY when SSB was below FMSY B-Trigger or applying precautionary approach, and reducing the fishing mortality, fishers' effort are not paying off. The conclusion is clear: the MSY is no guarantee of stability and visibility.

Indeed, for some stocks, environmental shifts, including warming seas are clearly impeding the populations from achieving their life cycle, in accordance with historical references. For instance, we can draw attention to the case of the sole 8ab. According to the French research project

RELIEF conducted by Ifremer and the Institut Agro (France), it seems that there are fewer larvae arriving in nursery areas, corresponding to a mortality problem in the pelagic phase of the larvae. This trend comes on top of numerous unfavourable anthropogenic factors affecting sole nurseries (various types of pollution, port developments, etc.). It is then necessary to have a better understanding of the influence of the environment on stock dynamics to provide the sector with medium/long-term visibility.

As of last year, EAPO members call for an exhaustive analysis to assess the extent of climate change impacts, as well as anthropogenic impacts unrelated to fishing. In these new environmental conditions, EAPO is requesting that the adjustment of fishing opportunities according to the MSY approach take into account socio-economic balances and dependencies to key stocks. The overall recruitments dynamics require to be further studied to better understand the situation in the area and improve knowledge for better management of fish stocks. In addition, current stock management is based on species-by-species assessments. It is becoming urgent to move towards a multi-species approach, in particular to avoid choke-species scenarios.

Seabass 8ab

EAPO welcomes the important increase of the advised fishing opportunities for the seabass for 2026. This is an encouraging signal that demonstrates the result of good resource management. However, we acknowledge that this proposal is corresponding to a change in the reference points for stock assessment. If we can fish more, EAPO rather supports a limited fishing opportunities increase for 2026, with the hope of stabilizing the health of the stock over the long term and improving the visibility of fishing opportunities for sea bass over several years.

With this objective in mind, the French sector asked Ifremer (French Research Institute for Exploitation of the Sea) to formulate multi-year recommendations based on the new stock situation. It appears that a moderate 35% increase in fishing opportunities in 2026 would make it possible to avoid interannual fluctuations by 2033, assuming constant recruitment.

Thus, **EAPO recommends an increase of 35% from the 2025 fishing opportunities**.

This year should be an important step towards a transition to multi-annual management. We therefore ask the Commission to further examine such an approach, in close conjunction with relevant bodies (ICES and STECF) in order to both maximize production and minimize medium-term fluctuations.

Pollack 8 and 9a

While strong management measures have been introduced for the pollack over the past years like the implementation of a minimum catch size of 42 cm in 2024 for the main area 8abde, restrictions applied to recreational fishing and following several important reductions in TACs, we are once again facing an unfavourable advice.

EAPO remains deeply concerned about this advice that would lead to a severe choke situation for all stocks caught in the mixed fisheries, with a very strong socio-economic impact on related fleets.

As an ICES category 3 stock assessment was applied for the pollack, based on the rfb rule to provide MSY advice, EAPO express concerns on the data used (production data), while fishing activity was severely restricted by the provisional TAC level set for pollack in the first half of 2024 and the ban on certain gears from January 22 to February 20 aimed at protecting small cetaceans in the area 8abde. We request a more realistic assessment of the state of the stock and the improvement of scientific knowledge on pollack though dedicated research projects.

The French sector, heavily dependent on this resource, observed improved fishing yields in 2025, casting doubt on the validity of the new reduction recommended for 2026.

In view of the elements outlined above, **EAPO supports a rollover of the pollock TAC in the 8,9, 10 area (overall 1,199 tons, distributed as follow: 959 tons for zone 8abde; 108 tons for zone 8c; 132 tons for zone 9-10)**.

Once again, EAPO would like to see the ban on no-kill recreational fishing for this species extended at least to EU waters: the survival capacity of the individuals caught, which is reduced by nature (physiological fragility), is nil as soon as the depth of the fishing site reaches a few meters (pressure differential, swelling of the swim bladder, etc.).

Plaice 8 and 9a

Like for other several stocks, EAPO requires the best available scientific knowledge to pursue a dedicated and sustainable management of the resource. Plaice is an ICES category 5 stock, for which, without information on abundance or exploitation, it is considered that a precautionary reduction of catches should be implemented. As a result, every 3 years, the non-assessed stocks face a decrease of 20% of TAC. More than ever, we recall the importance of implementing scientific monitoring measures to avoid any harmful and excessive quotas reductions.

In the meantime, **EAPO recommends the roll-over of this TAC, which has already been significantly reduced on the basis of the precautionary approach (124 tons)**.

Whiting 8 and 9a

Given current production levels, EAPO members believes that the recommended reduction (TAC 2026: 990 tons) will have little impact on the fishery in the Southern Western Waters.

However, it is important to emphasize that following this advice would correspond to a 57% decrease in the TAC since 2023. This is clearly alarming and symptomatic of the state of many fishery resources in the area.

Sole 8ab

EAPO supports the advised TAC for the sole for 2026 (-1%). However, with regard to the sole stock, EAPO would like to highlight the significant efforts made by the fishing industry, which

unfortunately have not led to any improvement. As mentioned in the general comments, fisheries is the only sector where variability in management can be used for adjustments and thus trying to adapt to constantly decreasing TACs due to other factors, not currently considered.

Sole 8c and 9a

The Commission's proposal of -28% for the 2026 and 2027 TAC constitute a significant risk to fisheries targeting this stock, as it would create a critical situation of choke species**. EAPO recommends the roll-over of this TAC.**

Norway lobster 8a and 8b (FU 23-24)

If **EAPO recommends following the ICES advice concerning the norway lobster in 8a and 8b and welcomes the significant increase of the advised TAC (4,014 tons)**, we would appreciate more stability in the setting of quotas for this species. Following last year sharp decrease, this year's advice is particularly positive (+54%), especially for the fleets strongly depending on this important stock. But it is necessary to strive for greater stability and visibility for fishers in the future.

Norway lobster 8c (FU31)

EAPO welcomes the significant increase of the advised TAC (35 tons) but as for the rest of zone 8, would appreciate more stability.

Rays 8 (SRX/89-C)

In light of the scientific advice from ICES and the calculation method used by the EU and the UK, **EAPO recommends following the advice of ICES, corresponding to a 3% increase of the TAC for rays (6,085 t)**. In addition, EAPO recommends introducing 10% flexibility with zone 7 in both directions.

Undulate ray 8

EAPO members are requesting that allocated quota for vessels respectively participating in a sentinel fishery are maintained to allow fisheries-based data collection for this stock. We earnestly hope that the data collected for scientific purposes will enable us to determine the sustainable exploitation level for this resource.

Due to the numerous science-based elements already available indicating the abundance of the stock, **EAPO is requesting the setting of a 2026 TAC according to the biomass observed, i.e. an increase of the TAC**.

Hake 8abde

EAPO emphasizes that fishing mortality F is lower than FMSY and that the SSB of north hake is higher than Btrigger. Furthermore, fishing mortality has been influenced since 2022 by the application of Implementing Regulation 2022/1614 (Commission Implementing Regulation (EU) 2022/1614 of 15 September 2022 determining the existing deep-sea fishing areas and establishing a list of areas where vulnerable marine ecosystems are known to occur or are likely to occur), which closed certain historical areas frequented by several fleets to fishing, with an important impact on catch volumes. For these reasons, **EAPO proposes a roll-over of the northern hake TAC (58,272 tons)**.

In regards of the negotiations on hake with third countries, EAPO would like to stress that it is crucial that the zonal allocation of northern hake stock do not lead to a change in the overall TAC allocation to the detriment of the sub-TAC in zone 8abde.

Hake 8c and 9a

In regards of the stock of Hake 8c 9a, EAPO notes that fishing mortality F is below MSY and that SSB, which is increasing, is above Btrigger. Thus, **EAPO recommends a roll-over of the TAC (17,445 tons)** in order to maintain the socio-economics of fleets depending on this resource.

Megrim 8abde

In regards of megrim 8abde, **EAPO recommends setting the 2026 TAC at a value between Fmsy (14,869 tons) and EU multiannual plan's Fmsyupper (22,931 tons) - zones 7b-k, 8abde -** in order to mitigate the socioeconomic impact on the concerned fleets. We would like to highlight the importance of keeping the actual flexibility levels between zone 7 and zone 8abde, especially in light of the decrease of the advised TAC.

Megrim 8c and 9a

Due to the exponential increase in SSB over the past five years and as the fishing mortality is under FMSY, **EAPO recommends setting the TAC for 2026 at 5,585 tons** in line with the variation of the scientific advice (+ 25,6%).

Anglerfish 8abde

In regards of anglerfish 8abde, **EAPO supports ICES advice and recommends setting the 2026 TAC at 58,480 tons** (zones 7, 8abde). Here also we are supporting the 10% flexibility between zone 7 and zone 8abde.

Anglerfish 8c 9a

EAPO notes that *Lophius budegassa* has a rapidly increasing SSB and a low F, and that *Lophius piscatorius* has a high SSB and a low F. To set the 2026 TAC, **EAPO recommends a rollover (5,432 tons)**.

Yours Sincerely,

David Milly, Chair of EAPO South Western Waters Working Group