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PelAC reference: 2526PAC02
Subject: Recommendations on 2026 fishing opportunities

Dear Ms. Charlina Vitcheva,

The Pelagic Advisory Council (PelAC) appreciates the opportunity to comment on the “Communication from the Commission towards more sustainable fishing in the EU: state of play and orientations for 2026” and to provide recommendations on Total Allowable Catches (TACs) in 2026 for stocks under its remit.

In case you have any questions, please do not hesitate to contact the Secretariat. Thanking you in advance for your kind consideration and looking forward to your response.

Kind regards,



Esben Sverdrup-Jensen
Chair of the Pelagic Advisory Council





Annex 1: PelAC response to the 2026 fishing opportunities communication

Economic performance of the EU fleet

The PelAC would like to underline that the 2026 catch recommendations for widely distributed stocks will have significant social and economic repercussions on the fleets concerned in each Member State. These repercussions will also impact Coastal communities dependent on these stocks and the rest of the fisheries supply chain that rely on mackerel and blue whiting: fish auctions, processors, suppliers and shipyards. In this context, the PelAC would recommend that the Commission request a socio-economic impact assessment of the reduction on the European Fisheries Sector.

As underlined in last year's document, the PelAC continues to stress the importance of ensuring better alignment between the scientific advice data and future projections by STECF for the economic analysis of the fleet.

The State of EU fish stocks

Article 50 of the Common Fisheries Policy (CFP; Regulation (EU) No 1380/2013) of the European Parliament and of the Council of 11 December 2013 stipulates: *"The Commission shall report annually to the European Parliament and to the Council on the progress in achieving maximum sustainable yield and on the situation of fish stocks, as early as possible following the adoption of the yearly Council Regulation fixing the fishing opportunities available in Union waters and, in certain non-Union waters, to Union vessels."*

The Commission response draws on the analysis carried out by STECF adhoc-25-01 report, on the *Monitoring the Performance of the Common Fisheries Policy*¹. The PelAC will base its responses on the STECF report. The STECF report uses data exported from the ICES website on 22 January 2025, corresponding to advice provided by ICES in 2024 for 2025 fishing opportunities. However, the data included in the report cover the years 2003–2023, and the forecasted values for 2024 used by ICES in its advice are not included. Therefore, the report does not use the most up-to-date data from ICES and its utility as a forward-looking evaluation is limited. Since the Commission's communication is published in early June, at the same time as ICES advice for the following year, both reports have presented different realities in recent years. This is challenging, as the STECF report is not taken into account by the Commission in setting fishing opportunities for the following year. Therefore, PelAC suggests that either:

- The STECF analysis is delayed until the most up-to-date data is available. or
- The report be published earlier or on a bi-annual basis to avoid confusion with ICES advice released in the summer.

The data presented in the STECF report and the Commission communication use the number of stocks to compute the F/FMSY and B/B2003 indicators. For widely distributed stocks, this leads to an average F/FMSY ratio of 0.74. A value below 1 indicates the stocks are being fished sustainably. However, due

¹ https://stecf.jrc.ec.europa.eu/documents/d/stecf/stecf_25-01_adhoc





to the lack of comprehensive long-term sharing arrangements which follows an ecosystem-based for key pelagic stocks, it is well known that F is well above F_{MSY} due to overfishing by some parties. In using the number of stocks, rather than a weight based on the volume of each stock, in this specific case creates the impression that the CFP objectives are being met for widely distributed stocks, which is misleading. The PelAC highlights the following suggestion from the STECF report: *“STECF reminds readers that model-based indicators represent averages of fishing mortality and biomass trends across stocks of very different sizes and landing volumes. Consequently, a small stock with low catches or biomass carries the same weight as a large stock with high catches. STECF also emphasizes that the CFP does not aim to achieve its MSY objectives on average (as monitored by model-based indicators) but to achieve these objectives for all stocks”*.

Moreover, the STECF report fails to reflect that Western horse mackerel was benchmarked in 2024. The previous model estimated the stock to be below Blim, leading to a zero-TAC advice, whereas the new model estimates SSB around $MSY B_{trigger}$. Comparing a zero-TAC advice to a new F_{MSY} provides a skewed view of the stock's status. The report also excludes Atlanto-Scandian herring, for which F and F_{MSY} values are available despite the lack of a TAC value. Thus, the ratio for widely distributed stocks in the 2025 STECF report cannot be considered representative of the current reality. As part of the evaluation of the CFP, the PelAC recommends that the Commission assess whether the current request to monitor the CFP to STECF is fit for purpose.

To conclude on the state of fish stocks, the PelAC wishes to comment the Commission's statement that: *“A resilient and prosperous coastal community cannot rely on fishing activities alone”* and that *“to withstand and adapt to increasing pressures, coastal communities and fishers need to step up preparedness and diversify activities where needed.”* While the PelAC agrees that diversification should be explored to ensure resilient and prosperous coastal communities, This should not be the justification for pushing the fishers out of fisheries and for inaction in addressing the need to achieve fisheries that do not exceed the scientific advice and take into account the ecosystem elements in the context of the triple planetary crisis.

Coastal States arrangements

As repeatedly communicated, the PelAC remains concerned about the current situation in the Northeast Atlantic, particularly the absence of sharing arrangements between Coastal States for managing widely distributed stocks. However, the PelAC welcomes the Commission's approach to reaching sharing arrangements with Coastal States which follow a long-term ecosystem-based approach to fisheries management and supports the introduction of new trade-based measures to act as a deterrent to irresponsible fishing nations to desist from overfishing of these stocks.

This is urgently needed, given that Norway, the Faroe Islands, and Iceland have continued to set excessive, unjustified unilateral quotas, leading to systemic overfishing and jeopardizing the sustainability of the mackerel stock. Increased fishing effort by Russia in international waters, which remains subject to no control or monitoring, has exacerbated the problem. The PelAC underlines the importance of using the approved revision of Regulation (EU) 1026/2012 to ensure that long-term sharing arrangements can be agreed upon and that unilateral actions by non-EU Coastal States cease.

This may not necessarily be effective in the case of Russia. Finally, the PelAC notes that access to





EU waters should be conditional a successful conclusion of relevant Coastal States sharing arrangements.

Balance between the fishing capacity of the Member States' fleets and their fishing opportunities

PelAC members were presented with the results of the Commission communication on the balance between fishing capacity and fishing opportunities during the July meeting. They stressed the importance of basing the report on accurate and updated data. As highlighted in previous PelAC comments, STECF should consider using the most up-to-date data in its reports. The PelAC noted on numerous occasions that publishing data with a two-year delay leads to conclusions that do not reflect the current situation of the fleets.

Clarity should be ensured in the communication regarding the years discussed in Member States' capacity reports. For example, in Denmark, the Fleet Capacity Report published in 2024 uses:

- Fleet, activity, and landings data from 2023,
- Economic performance data from 2022, and
- Biological indicators calculated for 2014–2022 (based on updated landings and ICES stock data).

However, the Staff Working Document treats this as a 2024 capacity report. This distinction must be made clearer, particularly for 2023, as Brexit decommissioning schemes were implemented that year, leading to a reduction in capacity ceilings.

PelAC members also stress that the Balance Capacity Report for fleet performance presents issues in its conclusions due to the subjective nature of its guidelines. STECF² has also continued to question the utility of several indicators (SHI and VUR) used in the analysis based on data and methodological issues. As part of the evaluation of the CFP the Commission should take this on board and consider the structure and indicators used and whether the current balance/capacity analysis is fit for purpose. STECF should be requested to advise on improvements to the current process that would provide a more accurate indication of the evolution of the EU fleets.

The PelAC welcomes the Commission's work to establish common harmonized guidance for the monitoring, certification, and verification of engine power of EU catching vessels, in line with the Control Regulation. The PelAC looks forward to seeing the results of the working group dedicated to monitoring engine power but continues to have concerns that this will add complexity, costs and additional red tape for operators.

Regarding the STECF Annual Economic Report, it is difficult for the PelAC to consider the EU large scale fleet as a uniform segment. This segment includes 120 m pelagic trawlers and 7m dredger. A

² European Commission: Joint Research Centre, Scientific, Technical and Economic Committee for Fisheries (STECF) - Assessment of balance indicators for key fleet segments and review of national reports on Member States efforts to achieve balance between fleet capacity and fishing opportunities (STECF-24-13), Casey, J., Gras, M. and Virtanen, J. editor(s), Publications Office of the European Union, Luxembourg, 2025, <https://data.europa.eu/doi/10.2760/0565930>, JRC140753.





dedicated segment for vessels less than 12m that cannot be part of the SSCF segment should be set up.

Long term management strategies

Contrary to the previous year's communication and staff working document, this year's iteration does not mention long term management strategies. The PelAC will keep working on LTMS for stocks under its remit and call for the use of Management Strategy Evaluations to design and approve them. Future MSEs will need to include, where appropriate:

- climate considerations,
- the species' role in the food chain
- implementation errors.

All future Long-term Management Strategies developed by the PelAC will need to be in line with Ecosystem Based Fisheries Management.

The PelAC will work on developing an LTMS for boarfish and hopes that the agreement on long-term sharing arrangement for shared stocks will provide the basis for a future LTMS.

Finally, the PelAC would like to suggest the inclusion of exceptional circumstances provisions in future LTMS in the event where the dynamics of the stock are outside the range of possibilities tested by the MSE.

Quality assurance and the role of Science

Regarding Quality assurance and the role of Science, the PelAC has consistently worked to improve quality control of ICES advice and address the issues and inconsistencies found in ICES publications. A specific example relates to Irish Sea herring, where persistent errors have been found with the advice, resulting in the advice being re-issued on several occasions. PelAC has requested in its previous advice that a benchmark be carried out for Irish Sea herring. The Irish Sea herring advice has been reissued in 2024 and in 2025 due to errors in the model. The revised catch advice has not been followed by the EU and the UK leading to overfishing of the stock.

To ensure continuity in ICES advice, the PelAC supports the suggestion of designating more than a single stock assessor for each stock, and if possible, from multiple scientific institutes. Doing so would ensure that the stock can still be assessed, and advice can still be published if the stock assessor is ill or is unable to carry out the assessment.

Finally, the PelAC would like to stress the importance of investing in modelling and scientific resources alongside data collection. EU funds have been massively invested in data collection but ensuring that the data can be used is key, and training scientists to model and interpret the data. Ensuring that their respective needs are met will be key.





Implementation of EU legislation to address Climate Change and rebuild stocks

As underlined in its previous advice, the PelAC would like to underline the importance of developing measures at EU level to address Climate Change and rebuild stocks. This is noted in STECF's CFP monitoring report, *"Ecosystem development and rising water temperatures seem to play a role" in the substantial reduction of fishing opportunities*. This is of importance in the NE Atlantic and North Sea where sea surface warming and reduced riverine nutrient inputs reduces primary production and impacts the whole ecosystem³. ICES notes that for North Sea herring and in fact for many herring stocks, productivity has been low for the last two decades and has yet to reach levels of productivity seen during the 1990s.

The Commission concludes its 2025 communication by insisting on the importance of implementing EU legislation for European Member States in order *"to tackle the pressure on fish stocks stemming from activities other than fisheries."* The PelAC welcomes this approach, as *"A healthier marine environment is a condition for a more resilient and more prosperous fishing sector"*.

In line with its previous year's advice, the PelAC would also like to underline key advice from ICES on non-fisheries conservation considerations and the importance of its uptake to ensure the rebuilding of fish stocks. For example, for herring stocks, *"ICES advises that no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental."*⁴

Consistent with the advice published on the Impact of ORE development on the marine ecosystem⁵, the PelAC suggests following the ICES advice that no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental. The PelAC recommends that more funds be invested into identifying and safeguarding these areas. More specifically, we call on Member States to effectively adopt a precautionary approach in this regard, by not allowing the development of large-scale activities in known herring spawning grounds, including Offshore Renewable Energy developments and gravel extractions, until the impacts of these are fully known.

³ Capuzzo E, Lynam CP, Barry J, Stephens D, Forster RM, Greenwood N, McQuatters-Gollop A, Silva T, van Leeuwen SM, Engelhard GH. A decline in primary production in the North Sea over 25 years, associated with reductions in zooplankton abundance and fish stock recruitment. *Glob Chang Biol*. 2018 Jan;24(1):e352-e364. doi: 10.1111/gcb.13916. Epub 2017 Oct 24. PMID: 28944532.

⁴ ICES. 2024. Herring (*Clupea harengus*) in Subarea 4 and divisions 3.a and 7.d, autumn spawners (North Sea, Skagerrak and Kattegat, eastern English Channel). In Report of the ICES Advisory Committee, 2024. ICES Advice 2024, her.27.3a47d. <https://doi.org/10.17895/ices.advice.25019285>

⁵ https://www.pelagic-ac.org/wp-content/uploads/2025/03/2425PAC22_PelAC_advice-on-Impact-of-Offshore-Renewable-Deployment-on-Marine-Ecosystems.pdf





Stock by Stock considerations

Atlanto-Scandian herring

The PelAC again encourages the Commission and Member States to seek a rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for the stock. The current situation with no agreed sharing principles is not sustainable in the long-term.

In the current Coastal States consultation, the PelAC strongly condemns the attempts from Norway and the Faroes to exclude the EU from the negotiations claiming the EU is not a Coastal State with respect to ASH. This has translated into a lack of access for EU vessels to Norwegian waters. The PelAC stresses the EU should seek to restore access in line with levels previously paid for by the EU.

The PelAC is seriously concerned over the impacts of current TAC overshooting. Considering this, the PelAC urgently recommends the Commission to encourage Coastal States to revisit the management plan currently in place for this stock and asking ICES what revisions would be necessary to avoid the scenario of the stock falling below Blim. When revising the LTMS of Atlanto-Scandian herring, the PelAC recommends the Commission to ask ICES to undertake a MSE process that would generate scenarios that visualise the impacts of current TAC overshoots.

The PelAC recommends the Commission that any revision of the LTMS for Atlanto-Scandian herring should ensure that the implementation of the revised LTMS is considered precautionary by ICES, based on an MSE evaluation in line with the internationally agreed objective of restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield. The LTMS should also aim to achieve long-term sustainable fisheries, take an ecosystem-based approach to fisheries management that considers ecosystem and climate-driven changes in the productivity of Atlanto-Scandian herring in the Northeast Atlantic. Particularly, this LTMS revision should also aim to secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with an ecosystem-based approach. Moreover, the PelAC wishes to underline that since 2019, ICES has underlined that failing to adhere to the advised catches as derived from the application of the long-term management strategy may not be.

The PelAC is worried about the inclusion of data from countries that have seen their membership to ICES removed. While ensuring that reporting data is of high quality is of the responsibility of the Member State reporting the data, the PelAC wishes to ensure that non-ICES Member States still follow the TAF.

The PelAC recommends following the ICES advice based on an agreed Long-Term Management Strategy and setting the TAC at 533 914 tonnes in 2026.

Blue whiting

The PelAC again encourages the Commission and Member States to seek a rapid agreement with all Coastal States on a sustainable long-term sharing arrangement for the stock. The current situation with no agreed sharing principles is not sustainable in the long-term. Any comprehensive sharing arrangement should reflect the EU's genuine and traditional interest and historical track record.





The PelAC notes the use of zonal attachment by other parties in the sharing arrangement discussions fails to correctly encompass the complexity of blue whiting and its subsequent fisheries.

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.

The PelAC also stresses its concerns at the continued protection of the Russian reserve by several Coastal State parties.

The PelAC notes that the ICES advice suggests a decline in stock biomass and a downward revision of the perception of the stock biomass. While the signals in the assessment reflect a downward shift in the stock, the PelAC has concerns that the limitations due to weather conditions in carrying out the acoustic survey, integral to the blue whiting assessment, have impacted the quality of this survey. The biomass assessment would appear to have been unevenly influenced by the fact that this single survey was carried out 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 PelAC notes there is considerable retrospective bias in the assessment and encourages ICES to benchmark this stock urgently to improve the quality of the assessment.

The PelAC recommends the Commission that any revision of the LTMS for blue whiting should ensure the implementation of the revised LTMS is considered precautionary by ICES, based on an MSE evaluation. The LTMS should follow internationally agreed objectives of fishing at or below levels that can produce MSY. It should aim to achieve long-term sustainable fisheries, taking an ecosystem-based approach to fisheries management that considers ecosystem and climate-driven changes in the productivity of blue whiting in the Northeast Atlantic. The revised LTMS should also aim to secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with the ecosystem-based approach.

This LTMS should be preceded by a Management Strategy Evaluation to identify measures and levels of fishing effort needed to avoid the scenario of the stock falling below Blim and to maintain it above MSYB_{trigger}. The MSE should also investigate the impact of climate change and ecosystem shifts.

Boarfish

The boarfish stock was benchmarked by ICES in 2024, and a new category 1 assessment developed. ICES now provides annual advice for the stock. The PelAC notes that the ICES advice for 2026 appears to be driven by the single 2025 acoustic survey data point, which was 36% (158 000 tonnes) lower than the 2024 estimate. Furthermore, the PelAC notes this level of reduction is not supported by the recent catches of the stock and contradicts the other indices including those from an IBTS survey in the assessment, which indicated an increase in biomass.

The PelAC notes that the SSB remains at historically high levels for a long-lived species. Fishing mortality 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 to provide a better understanding of recruitment.

The level of decline advised by ICES differs from the observations from PelAC members at sea. The PelAC requests that the raw survey data are reexamined to ensure that no errors have been made. Additionally, the PelAC urges the Commission and ICES to allow for an in-year update to the advice and TAC if the 2026 acoustic survey aligns with historical norms—confirming the 2025 data as an outlier. This may permit expanded fishing opportunities in Q4 2026.

The PelAC is fully committed to working on the development of a Long- Term Management Strategy for boarfish. Moreover, once the LTMS is revised, the PelAC recommends that it undergoes an MSE. PelAC has set up an ad hoc group to define the objectives for a future MSE.

The PelAC recommends the Commission that any revision of the LTMS for boarfish should ensure that the implementation of the revised LTMS is considered precautionary by ICES, based on an MSE evaluation in line with the internationally agreed objective of restoring and maintaining, stocks above biomass levels capable of producing maximum sustainable yield. The LTMS should also aim to achieve long-term sustainable fisheries, take an ecosystem-based approach to fisheries management that considers ecosystem and climate-driven changes in the productivity of boarfish in the Northeast Atlantic. Particularly, this LTMS revision should also aim to secure the stock's role in maintaining healthy food webs in the ecosystem, consistent with an ecosystem-based approach.

The PelAC also suggests investigating previous high recruitment periods for boarfish to help understand the nature of spasmodic stocks. The PelAC supports a PhD study project planned by the Irish Marine Institute to better understand the recruitment drivers and diets of boarfish.

Noting, industry concerns on the quality assessment and the request for a re-examination of the survey and possible in-year review based on the 2026 survey, **the PelAC supports the ICES advice of 29,720 tons in 2026 based on the F_{MSY} approach.**

Northeast Atlantic Mackerel

The risk of spawning stock biomass (SSB) falling below Blim that has been long feared by the PelAC over the past years has finally happened. The zero TAC advice is avoided only thanks to ICES guidelines which allow catches above zero when the resulting fishing mortality enables the spawning stock biomass to recover above Blim with a sufficient probability in the year following the advice. This is the case for mackerel for which this year's headline advice is based on MSY approach and ensures that the SSB will be above Blim in 2027 with a 50% probability.

For the past years, the PelAC has urged Coastal States to adopt a Long-Term Management Strategy (LTMS) deemed precautionary by ICES and consistent with the internationally agreed objectives of restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield and which takes into account the role of mackerel in the ecosystems. This process was in vain. With the stock now below B_{lim} , and some Coastal States continuing their consistent approach which is based on partial sharing arrangements - and the systematic setting over many years of excessive unilateral quotas whose sum exceeds the TAC. This is irresponsible IUU style behavior is further compounded by Russia's increasing fishing effort, often unreported and unregulated in international waters. In this context the PelAC believes that the stock situation





could move to a zero-catch scenario in the coming years without a genuine rebuilding plan and strict adherence to a comprehensive sharing agreement.

This rebuilding plan must be ambitious: it should integrate an ecosystem-based approach, account for the impacts of climate change on mackerel productivity in the North-East Atlantic, safeguard the stock's role in maintaining healthy food webs, control the uptake in the International segment, and immediately reverse the declining trend – and aim to rebuild the biomass sustainably above Blim by 2027. Above all, such a plan cannot succeed without a comprehensive, binding, sharing agreement that respects historical catch levels, ensures that scientific advice is not exceeded, and ends the spiral of excessive unilateral quota setting. Nor can it reward those who, year after year, have turned overfishing and quota grab into a management method. This comprehensive long-term sharing arrangements should be based on the 2014 sharing agreement and should not reward the constant systematic IUU style overfishing which based on inflated quotas set by some parties in recent years.

It must be recalled that the EU is the only Coastal State that has always respected its quotas and ICES scientific advice. But what is virtue worth when others are systematically plundering this stock? The reality is that the sustainability of the mackerel stock is seriously compromised, and every deviation from ICES recommendations, coupled with every token agreement between the UK, Norway, and the Faroe Islands to legitimize excessive quotas, has contributed to and deepened the current crisis.

The October 16–17 coastal States meeting to set the TAC will be decisive. Even without a sharing agreement, the cut in fishing possibilities will challenge the resilience of fleets and on shore processing and will be “abyssal”. It is time for the Commission to put its full weight on the scales: as the primary market for mackerel and other aquatic products exports, particularly from Norway, it holds considerable trade leverage. EU Regulation 1026/2012 on stock conservation provides a measure to address this situation and making access to the European market conditional on compliance with the rules.

This amendment to EU Regulation 1026/2012 is relevant in this regard to define “unsustainable state”, which means : *“the condition where the stock is not continuously maintained at or above the levels that can produce maximum sustainable yield” or “if those levels cannot be estimated, where the stock is not continuously maintained within safe biological limits in line with the precautionary approach to fisheries management as referred to in Article 6 of UNFSA; the stock levels determining whether the stock is in an unsustainable state are to be determined on the basis of best available scientific advice”*.

Major European retailers and processors must also be mobilized to refuse to supply their chains with imported mackerel or other aquatic products originating from inputs linked to the excessive unilateral quota setting and irresponsible fishing by other Coastal States. The PelAC calls on the importance of the implementation of the revised control regulation provisions on traceability in order to allow additional efforts in promoting sustainably caught mackerel in the EU.

Furthermore, the PelAC stresses the urgent need to launch a Management Strategy Evaluation (MSE). This request would aim to assess the integration of ecosystem considerations, rebuilding measures, and the consequences of implementation errors within a long-term management strategy (LTMS). Particular consideration should be paid to setting clear operational objectives and incorporating ecosystem considerations, including climate robustness and resilience testing, as well as exploring the role of mackerel in the ecosystem. These could be integrated in a form of variable natural mortality





parameters by age and over the time. The MSE request should include exploratory work to include the results of WKNEWREF, WKREBUILD and ICES's FEISA report.

The PelAC would also draw attention to the situation of summer fishing in international waters. The fish are in poor condition following the spawning migration, they are scattered across wide areas meaning long trawling times, high bycatch levels and high fuel use compared to the level of catches. This practice will have a long-lasting and damaging effect on the mackerel stock. Large increases in fishing effort by the Russian Federation, are leading to significant unreported and unregulated catches, have also added to the decline in the stock. In this view, the PelAC calls for the resumption of discussions on specific limitations in international waters applicable to all Coastal States, within the framework of NEAFC, in order to avoid Olympic fishing, which may only take place in international waters by certain Coastal States.

The PelAC highlights that the issue of climate change and ecosystem changes affecting mackerel and fishing patterns should be incorporated into the comparative assessment of mackerel and requests the Commission to raise this issue for pelagic stocks. In this regard, the PELAC stresses that mackerel is not only important for fisheries, but it is also a critical species to secure healthy food webs of NE Atlantic ecosystem due to its role as prey for many predatory fish and other marine animals. The PelAC highlights that the rebuilding, protection and sustainable use of the mackerel stock is in accordance with the CFP and ecosystem-based fisheries management alongside with environmental policies and commitments such as: Maritime Strategy Framework Directive (MSFD) and Convention on Biological Diversity (CBD) Global Biodiversity Framework.

The PelAC recommends following ICES advice on MSY and setting the TAC for North-East Atlantic mackerel at 174 357 tons in 2026.

The PelAC underlines the significant social and economic repercussions that such a reduction of the European fishing possibilities for mackerel would have on the fleets concerned in each Member State. The PelAC calls on the STECF to consider a harmonised socio-economic impact assessments across the entire supply chain, in order to provide a clear picture of the consequences in terms of revenue loss not only for fishing industry companies, but also for fish auctions, processors, suppliers and shipyards. These assessments should also take into account the markets lost as a result of such a reduction. With the aim to allow managers to apply socio economic and market measures to mitigate these impacts.

The fishing sector representatives stress that the affected European fleets cannot be held responsible for this situation, as European fishers have always respected their quotas in line with the constant EU part allocated by previous sharing arrangement. The responsibility lies with the non-cooperating Coastal States, whose actions undermine the collective and sustainable management of the stock. In the framework of the socio-economic impact assessment, a complementary exercise should also be undertaken to evaluate the economic benefits reaped by those other Coastal States that have systematically exceeded their historical shares and, in doing so, contributed to the overshoot of the TAC.

Once again, the PelAC suggests aligning management measures with the 2024 scientific advice which removes the sub-component hypothesis for mackerel. This entails harmonizing MCRS for mackerel to 20 cm across all management areas (EU Technical measures Regulation), thereby avoiding unwanted catches that would further deplete the EU's already "meager" TAC, and removing redundant management measures for MAC/*3A4BC in areas 3a, 4b and 4c to protect the non-existing North





Sea component in the TAC and Quota Regulation for 2026. Special provisions for MAC/*03A, MAC/*04B and MAC/*04C should be removed and without prejudice to the relative stability keys and historical arrangements.

The PelAC has commented on the results of the 2025 benchmark in a dedicated advice available [here](#).

Horse mackerel

The PelAC notes that the benchmark of the horse mackerel stocks carried out by ICES in 2024 highlighted several critical issues and significant data gaps that require attention to ensure the provision of accurate advice for the Western, Southern and North Sea horse mackerel stocks. To fill these gaps, the PelAC highlights the need for specific studies targeting these stocks as identified in the benchmark report.

The PelAC recommends that dedicated horse mackerel surveys be prioritised and adequately funded to improve data quality and coverage to improve stock assessments and, consequently, the management decisions that are based on the advice. Unified assessments would facilitate more accurate interpretation of the data and promote coherent management strategies across all regions. A framework for the collective assessment of these three stocks should be discussed at the MIACO meeting in January 2026.

The PelAC notes the longstanding and unresolved problem remains the fact that ICES advices for western and southern horse mackerel pertain to *T. trachurus*, while the TAC cover mixed catches of *Trachuris species*, including *T. picturatus* (blue jack mackerel), and *T. mediterraneus* (Mediterranean horse mackerel). These combined TAC prevents effective control of single-species exploitation rates and could result in the overexploitation of one or more species, and underexploitation of *T. trachurus* currently evaluated by ICES. Finally, the PelAC recommends that the fishing opportunities regulation be adapted to ensure a TAC in line with *T. trachurus*.

In addition, there is an urgent need to integrate ecosystem elements and changes that affect fishing patterns and the assessment of horse mackerel stocks, such as climate change. The complexity of marine ecosystems and the interactions between species require an ecosystem-based approach to fisheries management. However, the current reference framework raises many questions about the best way to integrate these elements. We call on the European Commission and ICES to provide clear guidelines and support the integration of ecosystem considerations into stock assessment processes. This should be also discussed at MIACO meeting.

Western Horse Mackerel

The PelAC recommends following the ICES advice and setting the TAC for 2026 at 74 214 tons based on the MSY approach.

The PelAC underlines the importance of continued data collection and extension of the genetic stock identification research through additional surveys to strengthen management, noting the existence of mixed fishery with North Sea horse mackerel in the Channel.





Southern Horse Mackerel

The PelAC recommends following the ICES advice for 2026 which sets catches at 56 520 tons under the MSY approach.

The PelAC underlines that in the context of TAC covering mixed catches of *Trachurus species*, it was noted that 14% of the catch consisted of other *Trachurus* species.

The PelAC highlights that it was clarified that there is currently one stock component, but some genetic work has been conducted to better delineate the boundary between southern horse mackerel and western horse mackerel. These issues remain unresolved, and further research is needed.

The PelAC reiterates its strong call for the development and implementation of an updated multiannual management plan for southern horse mackerel, and recommends that the Commission request ICES to a Management Strategy Evaluation (MSE). This evaluation should explicitly test the effects of climate change, the ecological role of SHOM in the food chain and wider ecosystem, the implications of the current combined TAC structure covering multiple *Trachurus* species, and provide F_{MSY} ranges that are derived to deliver no more than a 5% reduction in long-term yield compared with MSY.

North Sea Horse Mackerel

The Pelagic Advisory Council (PelAC) notes that, for the second consecutive year, ICES has advised zero catch for the North Sea horse mackerel stock. PelAC recommends that the European Commission include this stock in its standing request to ICES on zero catch advice, with the explicit aim of enabling continued data collection for scientific monitoring purposes only. This would help maintain a category 1 assessment for the stock. PelAC emphasizes that, in other cases of zero catch advice, ICES has provided a scientific monitoring TAC option solely to support research and stock assessment continuity.

As presented during the inter-Advisory meeting held in July 2025, the PelAC notes that European Commission is already engaging with the United Kingdom to develop a rebuilding strategy for North Sea horse mackerel. In the absence of such rebuilding plan, the PelAC calls for an adequate data collection process to be established for 2026. This is essential to ensure the continuity of data collection for stock assessment purposes and to avoid the risk of the stock losing its Category 1 status. ICES itself highlights that the main surveys feeding into the assessment (NS-IBTS and FR-CGFS) are bottom-trawl surveys, which are not appropriate for horse mackerel given the low catchability of the gear used. The PelAC underlines the importance of further developing genetic stock identification for horse mackerel to improve data collection that can then be used to improve the models. Genetic stock identification will also help understanding the mixing between the western and North Sea stocks in the English Channel (divisions 7d and 7e). Additionally, the rebuilding plan should consider the effects of climate change and the ecological role of NSHOM in the food chain and wider ecosystem.

As described in the PelAC Horse Mackerel Focus Group (March 2023) report, a long-term research plan has been discussed and subsequently refined during the benchmark, resulting in a proposed five-year plan. This plan addresses six key areas: stock identification, biological data, fisheries-independent and dependent data, assessment development, and benchmark planning. The PelAC strongly urges the Commission and Member States to support these crucial scientific research priorities and to





ensure sustained progress in the development of horse mackerel stock assessments up to and including the next benchmark process.

Should the EU and UK again decide to set a bycatch TAC for this stock, the PelAC urges the relevant Member States and other Coastal States to implement measures that minimize catches in support of stock recovery, and to ensure that vessels authorized to use monitoring quota are subject to effective control measures. Moreover, if a bycatch TAC is agreed, it is imperative that the Commission and the Council guarantee proper coordination and harmonization in its implementation. In those years, insufficient coordination led to unforeseen practical issues at Member State level, undermining the level playing field. The PelAC has already raised these concerns and calls for them to be fully addressed going forward.

Finally, the PelAC recommends that the footnotes of the fishing opportunities regulation be adapted to ensure consistency between the North Sea horse mackerel and the Western horse mackerel.

Considering the differences between years in the retrospective analysis, the lack of F_{MSY} and F_{PA} as well as the fact that B_{lim} is set as 80% of B_0 , the PelAC is of the opinion that further work should be invested in improving the model to ensure that it is in line with ICES quality assurance guidelines.

