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To: Mr. Fabrizio Donatella
Director - Fisheries Policy Atlantic, North Sea, Baltic and Outermost Regions (MARE.C)
Directorate-General for Maritime Affairs and Fisheries
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Mr. Humberto Delgado-Rosa
Director – Biodiversity (ENV.D)
Directorate-General for Environment
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Subject: Support to the UK closure of industrial sandeel fishing in the North Sea

Brussels, Belgium, 11/03/2024

Ref 024-005

Dear Msrs. Donatella and Delgado-Rosa,

We are writing to you regarding the recent announcements by the UK and Scottish governments to close industrial sandeel fishing in both Scottish waters and the English North Sea as a vital step to protect and build the resilience of marine ecosystems, which will provide a much-needed boost to important populations of North Sea seabirds as well as contributing to ecosystem-based fisheries management in the North Sea.

This measure comes at a critical time, and it is underpinned by clear scientific evidence and overwhelming public support¹. OSPAR’s authoritative Quality Status Report, released towards the end of 2023, highlighted the poor state of seabird populations across the North East Atlantic.² Seabirds that

¹ As shown by the results of both UK (DEFRA) and Scottish Government consultations (see results: <https://www.gov.uk/government/consultations/consultation-on-spatial-management-measures-for-industrial-sandeel-fishing/outcome/summary-of-responses#annex-1-list-of-organisations-that-responded-to-the-consultation> and <https://www.gov.scot/publications/proposals-close-fishing-sandeel-scottish-waters-analysis-consultation-responses/pages/4/>)

² OSPAR Quarterly Status Report 2023 (available at: <https://www.ospar.org/work-areas/cross-cutting-issues/qs2023>)

feed near the surface are faring worse, with climate change and fishing primarily responsible for reducing the availability of food such as sandeel. Moreover, OSPAR Contracting Parties, including the EU, have committed to take urgent action to halt the decline of seabirds across the North East Atlantic in the current OSPAR Strategy³.

Recent scientific advice from ICES recognised that the annually set quota advice does not ensure that sufficient biomass is left for predator species that depend on it, and that solely relying on quota advice is insufficient to ensure ecosystem-based management and wider ecosystem resilience in line with Good Environmental Status. It highlighted the need for national management measures, noting in particular the needs of breeding seabirds which depend on food availability within proximity to their breeding colonies.

In light of this and of the myriad of other pressures which seabird populations are confronted with, such as climate change, offshore renewable expansion and avian influenza, measures that address manageable threats are vital to build the resilience of populations and wider marine ecosystems. The UK's progressive action to secure seabirds' food source is an important contribution to this end and it is incumbent on the EU to support this, especially considering its legal obligations to reach Good Environmental Status and to implement an ecosystem-based approach to fisheries management. We therefore ask for your support regarding this initiative, and in encouraging and facilitating the implementation of immediate complementary measures at Member State level which aim to fully account for the needs of seabirds and other marine predators.

We hope that you will acknowledge these considerations and we stand ready to answer any questions you may have.

Yours sincerely,



Ariel Brunner
Regional Director
BirdLife Europe and Central Asia

On behalf of:

ClientEarth, Dansk Ornitologisk Forening (DOF), The Fisheries Secretariat (FishSec), Royal Society for the Protection of Birds (RSPB), Seas at Risk

³ North-East Atlantic Environment Strategy (NEAES) 2030 (available at <https://www.ospar.org/documents?v=46337>)