



WWF-Norway
P. O. Box 6784 - St. Olavs plass
N - 0130 Oslo, Norway

Org.no.: 952330071
Tel: +47 22 036 500
Fax: +47 22 200 666
wwf@wwf.no
www.wwf.no
facebook.com/WWFNorge

Andrew Hough
Intertek Moody Marine
Merlin House
Stanier Way
Wyvern Business Park
Derby, DE21 6BF
United Kingdom

September 2, 2011

**Ref: WWF COMMENTS TO THE PUBLIC COMMENT DRAFT REPORT FOR THE
NORWEGIAN NORTH EAST ARCTIC INSHORE COD FISHERY**

Dear Mr Hough,

The cod population in the Barents Sea (North East Arctic Cod, ICES area I and II) is in good condition and the stock is classified by ICES as having full reproductive capacity and being harvested sustainably (ICES, ACFM 2008). WWF supported the MSC-certification of North East Arctic offshore cod, but we do have some concerns that need to be addressed for the potential certification of the North East Arctic inshore cod fishery.

WWF has carefully considered the draft assessment report. We acknowledge that the PCDR identifies a number of conditions which, if met, will improve the fishery over time. While MSC is the most rigorous standard for sustainable fishing, WWF is concerned about the coastal cod bycatch and the management plan for rebuilding the coastal cod stock.

The following section outlines WWF's concerns and questions regarding the draft assessment.

2.1.1 Retained Species Status

Main retained species are likely to be within biologically based limits, or if outside the limits there are measures in place that are expected to ensure the fishery does not hinder recovery and rebuilding of the depleted species.

Score: 70

Coastal cod is listed as an endangered species on the 2006 Norwegian red list and ICES has classified the stock as depleted. The population was declining from 1994 to 2003 and has stagnated since. The 2010 spawning stock is the lowest ever observed, and is not expected to increase.

Both peer reviewers have raised significant issues of concern with respect to coastal cod bycatch and the management plan for rebuilding the coastal cod stock:

- No reliable reference points available at the time of the assessment
- No biologically founded rebuilding target, no information on where the stock currently lies in relation to this target
- Monitoring of, and reporting on, rebuilding progress in absence of reference points and rebuilding target
- No action plan if rebuilding cannot be demonstrated
- Management measures are not demonstrably effective (effectiveness only indicated by ICES' simulations)
- No in-season ability to respond to hotspots of coastal cod bycatch (due to post hoc estimations of coastal cod bycatch)
- The NE Arctic inshore cod fishery is a large fishery - even low bycatch rates can constitute a high mortality rate for a depleted stock
- Questionable level of ambition of the coastal cod protection plan: '*minimising coastal cod catches as far as is practically possible*'
- Long rebuilding period

The assessment team acknowledges that bycatch of the depleted coastal cod is a key concern and raised a condition to ensure the fishery does not hinder recovery and rebuilding of any population outside biological limits.

However, WWF is concerned that condition 1 is not rigorous enough to achieve rebuilding of the depleted stock within 5 years. Peer Reviewer B states: Insufficient information is presented in the report to demonstrate how the status of this stock complex is assessed and whether adequate biological reference points (against which to evaluate stock status) can be developed.

Condition 1 requires that the rebuilding progress (of coastal cod) will be monitored and reported at subsequent annual MSC surveillance audits, but it is not clear what action is required if rebuilding (or a stock status that is within biologically based limits) cannot be demonstrated. The Client Action Plan has to adequately address this.

2.2.2 Bycatch Species Management Strategy

There is a partial strategy in place, if necessary, for managing bycatch that is expected to maintain main bycatch species at levels which are highly likely to be within biologically based limits or to ensure that the fishery does not hinder recovery.

Score: 95

According to ICES (ICES AFWG Report 2009) discarding of cod and haddock (and in some years also saithe) is thought to be significant in periods, although discarding of these, and a number of other species, is illegal in Norway and Russia.

The assessment team has attributed high scores to the bycatch performance indicators (100, 95, 80) while discards can be significant. Data on discarding is scarce, but attempts to obtain better quantification needs to continue.

In May 2004, the Norwegian 'Discard commission' published a report on how to deal with discards in Norwegian waters. The report gives some important recommendations, which should be part of the bycatch management strategy of the NE Arctic inshore cod fishery:

- Keeping the ban on discard of commercial fish species
- Expanding the current system of closing areas with undersized fish
- Increasing the use of inspectors at sea
- More efficient control of fish vessels at sea
- More efficient control when landing fish

2.4.1 Habitat Status

The fishery is highly unlikely to reduce habitat structure and function to a point where there would be serious or irreversible harm

Score: 75

Demersal trawling has a significant impact on seabed structure and the abundance of cold-water corals. The total impact of trawl and Danish seine activities, requiring an extensive mapping of fishing effort and bottom habitat across the North East Arctic region, has not yet been assessed.

Given that demersal impacts relative to habitat distribution have not been mapped and impacts on (sensitive) habitats are likely to be significant, a score of 75 seems unjustified for the trawl and Danish seine components of the fishery.

Condition 3 does not include an assessment of the potential impact of trawl fishing within known sensitive habitats, while the trawl component scores below 80.

1.2.3 Harvest Strategy Information / Monitoring

*A comprehensive range of information (on stock structure, stock productivity, fleet composition, stock abundance, fishery removals and other information such as **environmental information**), including some that may not be directly relevant to the current harvest strategy, is available.*

Air temperatures in the Arctic region have on average increased by about 5°C over the last 100 years. Arctic sea ice extent has decreased by 14% since the 1970s. Global climate change will continue to result in changes to the Arctic Ocean's temperature, acidity and sea ice coverage, with consequences on fish populations that are not yet well understood. Nonetheless, we know from observations of current patterns in the Arctic and other parts of the world that climate impacts can happen more quickly and at a greater scale than anticipated by models or scenarios

WWF believes that cod fisheries management needs to be adaptive and flexible in order to allow rapid adjustments as new information on the impacts of climate change becomes available. Failure to do so could mean that current management may prove to be inadequate as changes in seasonality, food availability, and migration result in changes in cod stocks that could not be foreseen under non-climate change scenarios.

Thank you for the opportunity to provide comments to the draft assessment report.



Karoline Andaur
Head of the Marine Programme

WWF Norway
Postboks 6784
St Olavs plass
0130 Oslo
kandaur@wwf.no
+47 93 22 47 90



Alfred Schumm
Director SFI

Smart Fishing Initiative
(Global Fisheries Programme)
Hongkong Str. 7
20457 Hamburg
alfred.schumm@wwf.de
+49 40 530 200-130