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WWF COMMENTS TO THE PUBLIC COMMENT DRAFT REPORT FOR THE NORWEGIAN NORTH EAST ARCTIC COLD WATER PRAWN

Dear Sandhya Chaudhury,

The cold water prawn population in the Barents Sea (North East Arctic cold water prawn, ICES area I and II) is estimated to be close to carrying capacity and the stock is classified by ICES as being healthy and harvested in a sustainable manner (ICES, NAFO 2010). WWF do however have concerns that need to be addressed for the potential MSC-certification of the North East Arctic cold water prawn fishery.

WWF has carefully considered the draft assessment report. We acknowledge that the DNV identifies a number of conditions which, if met, will improve the fishery over time. While MSC is the most rigorous standard for making sure a fishery is sustainable, WWF has concerns for by-catch and the possibilities for bottom trawling affecting the sea bed's habitat and biodiversity.

The following table shows WWF's concerns and severe questions regarding the DNV's assessment rapport.

MSC Certification Requirements C	Issue
2.7.11.1 The CAB shall ensure that every PI that receives a score of less than 80 has a condition associated with it.	<p>DNV have only placed one condition on three separate PIs. A condition must be placed separately on each PI, for example:</p> <ol style="list-style-type: none">1: A well defined and effective harvest control rules in place for the Barents sea stock by X.2: A management policy that has clear long-term objectives to guide decision-making that are consistent with MSC Principles and Criteria, and incorporates the precautionary approach is in place for the Barents sea stock X.3. The Barents sea Shrimp fishery has clear, specific

	objectives designed to achieve the outcomes expressed by MSC's Principles 1 and 2 by X
<p>27.11.1.4 The CAB shall draft conditions to specify milestones that spell out:</p> <ul style="list-style-type: none"> a. The measurable improvements and outcomes (using quantitative metrics) <u>expected each year.</u> b. The specific timeframes over which the milestones and the whole condition must be met. c. The outcome and score that shall be achieved at any interim milestones. <p>27.11.2.5 How the CAB will assess outcomes and milestones in each subsequent surveillance or assessment.</p>	<p>DNV has not set any milestones or defined who the outcome will be assessed each surveillance. DNV must set milestones for each year and define how it will be assessed.</p>
<p>27.11.1.2 The CAB should draft conditions to follow the narrative or metric form of the PISGs used in the final tree.</p>	<p>The conditions do not follow the narrative metric, See examples 1-3 above.</p>
<p>27.11.3.1 Consulting with those entities when setting conditions, if those conditions are likely to require any or all of the following:</p> <ul style="list-style-type: none"> a. Investment of time or money by these entities. b. Changes to management arrangements or regulations. c. Re-arrangement of research priorities by these entities. <p>27.11.3.2 Being satisfied that the conditions are both achievable by the client and realistic in the period specified.</p>	<p>It is clear that setting adequate conditions must happen at the stock level, not only the Norwegian level. It is clear that the Russian Federation must be consulted on the achievability of the conditions when defining the consultation. Yet 'ENCLOSURE 1' does not list any Russian consultation.</p>
<p>27.11.4 If the CAB cannot find evidence to show that funding and/or resources are, or will be, in place to address conditions, certification shall not be awarded.</p> <p>27.11.5 Where the client and the</p>	<p>As the peer review one points out "The client considers that the timeframe for implementing an HCR across the whole area might exceed the timeframe of the certificate". This really creates doubts whether resources needed to address the condition are in place and whether there is agreement that this condition can be</p>

<p>CAB are unable to agree on the terms of conditions and milestones that will achieve the required increase in the score in question, certification shall not be awarded.</p>	<p>fulfilled.</p>
<p>CB2.3.1 The team shall make a decision at SG80 if limit reference points set by management are above the level at which there is an appreciable risk of impairing reproductive capacity, and that target reference points are set at a level “consistent with B_{MSY}”.</p> <p>CB2.3.2.1 For the purposes of PI 1.1.2 or pre default tree PI equivalents the team shall interpret reference points as <u>reference points used for managing the fishery</u>— i.e. explicit or implicit points used by management as part of management procedures, management strategies or decision rules to trigger management action.</p>	<p>For the scoring of PI 1.1.2 the reference points referred to are those used by ICES, the scientists. Not those used by managers. Scoring must be based on the reference points used by managers of the Barents Sea stock.</p>
<p>27.10.6 To contribute to the scoring of any PI, the team shall verify that each scoring issue is fully and unambiguously met.</p> <p>27.10.6.1 Rationale shall be presented to support the team’s conclusion.</p> <p>27.10.6.2 The rationale shall make direct reference to every scoring issue and whether or not it is fully met.</p> <p>PI 1.2.1</p>	<p>Norwegian authorities have not established a TAC (Total Allowable Catch) for the Norwegian North East Arctic cold water prawn fisheries in the Barents Sea (ICES I and II). The absent of a TAC calls for the need of an explicit harvest control rule. There is no official management plan or formalized registration of by-catch in the cold water prawn fisheries either.</p> <p>No evidence is presented as to how ‘The harvest strategy <u>is responsive to the state of the stock</u> and the elements of the harvest strategy work together towards achieving management objectives reflected in the target and limit reference point’.</p> <p>WWF is concerned about certifying the cold water prawn fisheries in the Barents Sea before a sustainable harvest strategy is in place. A management plan will also have to</p>

	<p>be established before certifying the fisheries.</p> <p>This stock is transboundary, no information or evidence is presented on the HCR/Tools of the Russian Federation</p>
<p>27.10.6 as above 27.10.6.1 as above 27.10.6.2 as above</p> <p>PI 1.2.2</p>	<p>This stock is transboundary, no information or evidence is presented on the HCR/Tools of the Russian Federation.</p>
<p>27.10.6 as above 27.10.6.1 as above 27.10.6.2 as above</p> <p>PI 2.4.1</p>	<p>The current knowledge on the impacts of shrimp trawling on sensitive habitats is <u>incomplete</u>. Thus, it is not possible to say, with a high degree of certainty, that the fishery under assessment is highly unlikely to reduce structure and function of sensitive habitats in the Barents Sea to a point where there would be serious or irreversible harm.</p> <p>According to the assessment team, the knowledge of impacts of shrimp trawling on sensitive habitats is incomplete. Both the bottom trawling on soft sea beds and hard bottom habitats described for cold water prawn fishing, are influencing the bottom habitat due to fishing gear making contact with the ocean floor. For hard bottom trawling, rock-hopper gear is used and may be causing highly significant impact in affected areas.</p> <p>The knowledge about the ocean floor and its habitats and diversity is not fully established, and WWF believes the high potential for possible vulnerable habitats to bottom trawling, such as coral and sponges habitats must be evaluated further in order to secure biodiversity.</p>
<p>27.10.6 as above 27.10.6.1 as above 27.10.6.2 as above</p> <p>PI 3.1.4</p>	<p>According to the assessment team the by-catch is negligible. However there is information showing that problems with for example polar cod can be an issue from time to time. The Marine Resources Act states that all landings of by-catch are mandatory. However, disposal of all non-commercial species are solely the fishermen's cost and responsibility, which again can risk this regulation being undermined in the case of large amounts of by-catch.</p>

The Directorate of Fisheries unfortunately tend to agree with the fishermen on the fact that it is not always reasonable to bring big accidental catches of non-targeted species to shore, and the possibilities for discarding by-catch is always present. WWF calls for this practice coming to an end, and stresses that all by-catch must be landed (if not still alive and healthy). The mandatory regulation is not adequately enforced and monitored, and could affect the ecosystem negatively in the long run.

By-catch of commercial species since 1992 (estimates, Hvingel and Thangstad, 2010):

- Small cod 2-67 million fish/year
- Redfish 2-25 million fish/year
- Haddock 1-9 million fish/year
- Greenland halibut 0.5-14 million fish/year

As the numbers show, there is a great deal of uncertainty regarding by-catch levels. In addition to the commercial species, there is also registered by-catch of non-commercial species such as:

- Anglerfish
- Argentines
- Atlantic halibut
- Atlantic wolffish
- Blue ling
- Common sole
- European hake
- European plaice
- Greater argentine
- Ling
- Long rough dab
- Lumpsucker
- Pollock
- Rainbow trout
- Right eye flounders (unspecified)
- Roughhead grenadier
- Roundnose grenadier
- Saithe
- Skates and rays (unspecified)
- Spotted wolffish

	<ul style="list-style-type: none">• Tusk• Whiting <p>The overall by-catch is estimated to be between 1-3 percent and below the FAO limit of 8 percent. However there is no available data for possible damages caused by Nordmøre sorting grids on fish and invertebrates, and they may have a significant effect on mortality rate for different species hit by during the activity of trawling.</p> <p>WWF believes this information needs to be adequately used in the assessment and appropriate scores needs to be given</p>
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Thank you for taking our comments to the draft assessment report into account.

WWF-Norway



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WWF- Smart Fishing Initiative



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