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Att: Dr. Andrew Hough

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## **MSC Certification of NEA Saithe and North Sea Saithe**

### **Comments on the draft assessment report**

WWF refers to the invitation for commenting on the draft assessment report for the North East Arctic and North Sea Saithe Fisheries, and hereby provide our comments.

WWF wants to compliment the working group on their thorough work with the assessment report, and it is encouraging to see that the North East Arctic and North Sea Saithe Fisheries attain such high scores on the performance indicators.

WWF supports the report's primary findings and recommendations. A number of conditions are set by the assessment team for continuing certification, and Fiskebåt should address them accordingly. When the conditions are met WWF supports the recommendation that the North East Arctic and North Sea Saithe Fisheries receive MSC certification.

The main points of concern and need for adjustments are:

- Improved recruitment estimation and correction in the uncertainty in stock projections
- A wide-ranging review of the effects of trawling for saithe should be undertaken, and any new findings related to trawl gear impacts should be considered at future surveillance audits
- A complete monitoring and reporting system should be initiated to provide estimates of the bycatch of all species, also non-commercial, and should include estimates of discards and slippage
- Appropriate measures should be developed and implemented to reduce bycatch to acceptable and precautionary levels
- Measures should be taken to reduce the amount of discarding/slippage

## Stock assessment

The stocks in question appear to be healthy, and have shown a robust growth in recent years, probably due to a combination of favorable environmental conditions, good recruitment to the stock and strict regulations of the fishery.

However, recruitment estimation appears to be poor, related to both issues of pre-recruit surveys, the lack of reliable information about year class strength before age 3 and movement of juveniles between areas. There appears to be considerable, consistent bias in estimates of SSB and fishing mortality, such that at the moment stock size is underestimated and fishing mortality overestimated by the assessment. This is not of concern at the moment, but should the reverse bias be present during a declining phase it could result in the TACs being set above precautionary levels. As a consequence there is a need for improving the models used for the stock assessments. WWF acknowledges that this is no easy task, but thinks this would provide for a much more complete stock assessment. The issue is a significant source of uncertainty under current assessment and management approaches, and a resolution may be of significant importance should the stocks start to decline. Fiskebåt should in collaboration with the Institute of Marine Science (IMR) try to correct the uncertainty in stock projections.

## Fishing methods

Five methods of fishing are identified for both the NEA and North Sea fisheries: demersal trawl, gill nets, purse seines, Danish seine and hook and line.

The methods raising the most concern are trawl and purse seine. Saithe in the North Sea are mainly taken in a directed trawl fishery in deep water near the Northern Shelf edge and the Norwegian Deep, and in a typical year, about 78 % of the Norwegian catch originates from bottom trawl. However, the total impact of trawling activities has not yet been performed. Models for the North Sea suggest that trawling reduces biomass, production, and species richness. The bottom trawl fleet has reduced benthic biomass and production by 56 % and 21 %, respectively, compared with an unfished situation. Some saithe fishing takes place in areas with important seabird colonies or coldwater corals, and substantial effects of trawling have been documented elsewhere. Some vulnerable areas, like coldwater corals, are already protected but a full precautionary approach to protecting coldwater corals is not yet in place. A more wide-ranging review of the effects of trawling for saithe would be useful, and any new findings related to trawl gear impacts should be considered at future surveillance audits.

## Discards, Bycatch and “Slipping”

There is no information on the bycatch and discarding of non-commercial species, and this is a pressing issue. It may have a significant impact on the populations in question, although this is not specifically a problem for the saithe fisheries, more as for the entire fishing community.

The Norwegian Red List (2006) contains 31 marine species, including the blue skate (*Dipturus batis*) and the thornback skate (*Raja clavata*). Unfortunately, little is known on the catches of these and other PET fish species (e.g. sharks and rays) in most of the fisheries for saithe in both the North Sea

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and NEA. Rays and skates are known to be taken as bycatch in demersal trawl fisheries in the North Sea, and impacts on ray populations have been identified.

The system for recording marine mammal by-catches in the various saithe fisheries, which could be a major issue, appears to be essentially non-existent. Gill nets are acknowledged to have a high impact on harbor porpoises, but there are no direct assessments of the impact of the Norwegian fishery on sustainability of the harbor porpoise population. North Sea catches are estimated at over 4 000 per annum, and in the Skagerrak, annual bycatch probably exceeds 4 % of the total population and coincides with a decline in stock size. The harbour porpoise is not on the Norwegian Redlist, but it is a species for which Norway has accepted responsibility to maintain the population status (e.g. species which are globally threatened or over 25% of the total European population resides within Norwegian waters).

Information to examine the bycatch of birds is also incomplete. However, it is known that at certain times and in certain areas, there can be relatively large bycatch of diving seabirds in gill nets. There is urgent need for restrictions on gear to reduce bycatch of vulnerable seabirds in certain areas and during certain periods

Bycatch of other fish species also occurs. The stock of most concern is cod, and there are possible impacts of saithe fishing on cod in EU waters. There is no prohibition on discarding in EU waters and as a result, fishers in EU waters discard undersized fish fetching lower prices, and over quota fish. This hinders effective fishery management in the North Sea. The purse seine fleet apparently occasionally slips catches of undersized fish, even though this is illegal, and there are no reliable statistics on the volume so slipped.

WWF thinks that a complete monitoring and reporting system should be initiated to provide estimates of the bycatch of all species, also non-commercial, and should include estimates of discards and slippage. The potential impact of non-target species removals on the populations affected and the wider ecosystem should be evaluated. Appropriate measures should be developed and implemented to reduce bycatch to acceptable and precautionary levels. It should be mandatory to implement measures that have proved effective in reducing bycatches (such as the “kjalkeskrema” bird-scaring device) which have proved effective in reducing bird bycatch in the longline fishery.

Best regards,

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