

Introduction

Stakeholder input template

This template shall be used by stakeholders who wish to provide input into fisheries assessments.

To provide input on a fishery assessment, please complete sections 1 and 2 and email the template to the Conformity Assessment Body (CAB) completing the assessment.

Section 3 is optional if you have further input.

Stakeholder input is most useful to the assessment team when it is attributed to a Performance Indicator (PI), which assessment teams use to score fisheries, in the 'Evaluation results' section of the report.

Objective evidence or references should be provided in support of any claims or any claimed errors of fact.

An alternative method of stakeholder input is through attendance at the site visit and discussion with the assessment team, whether in person or remote.

If the fishery you are wishing to provide input on is at Final Draft report stage, information on objections can be found on the MSC website.

Contact the [CAB](#) or [your local MSC Outreach representative](#) if you have questions on completing the template

Template format

The stakeholder input template is formatted to allow assessment teams to respond to all stakeholder input, and copy the tables into the reporting template for upload to the MSC website.

Please add each point to a new row for easier categorisation.

Use 'Alt + Enter' for line breaks within cells.

Any queries related to the template should be sent to standards@msc.org

Resources

[MSC Fisheries Standard](#)

[MSC Fisheries Certification Process](#)

Instructions for CABs and assessment teams

CABs should complete the CAB response columns shaded blue in each page, noting that only the options listed in the Codes page may be used in the CAB Response Code cells.

Stakeholder contact and assessment details

Category	Contact details	Guidance
Title		Optional
First name*	Philipp	
Last name*	Kanstinger	
Organisation*	WWF Germany	Please enter the legal or registered name of your organisation or company.
Email*	Philipp.Kanstinger@wwf.de	
Department		Optional
Job title		Optional
Description		Optional description of your organisation
Phone number		Optional
Postal address		Optional
Fishery name*	Norway NEA cod	As the fishery appears in the Fisheries Update or on fisheries.msc.org.
Certification body (CAB)*		
Assessment Stage*	Stakeholder input on the Public Comment Draft Report	Insert the stage of the assessment that you're providing input.
Register*	I wish to register as a stakeholder - please keep me informed about each stage of the assessment process	Please indicate whether you'd like to register as a stakeholder for this assessment.

Performance indicator (PI)	Input summary	Input detail	Evidence or references	Suggested score change	CAB response to stakeholder input	CAB response code
Performance indicator - please refer to the table row to raise more than one input against a performance indicator	Summary sentence	Detail of stakeholder input	Objective evidence or references should be provided in support of any claims or claimed errors of fact.	If suitable, please provide a suggested score change based on your input and evidence. Optional	CAB responses should include details of where different changes have been made in the report (with section ID, table cell).	The CAB shall assign a response code to each one completed by the stakeholder.
Principle 1 - Sustainable fish stocks						
1.1.1 - Stock status	concerns regarding the cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented. WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented. WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
1.1.2 - Stock rebuilding	concerns regarding the BT3cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented. WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
1.2.1 - Harvest strategy	concerns regarding the cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented. WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
1.2.2 - Harvest control rules and tools	concerns regarding the cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented. WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
1.2.3 - Information and monitoring	concerns regarding the cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
1.2.4 - Assessment of stock status	concerns regarding the cod coastal stock. WWF would like to take part in the RBF for this stock.	WWF expresses concerns regarding the cod coastal stock. For Norwegian coastal cod (NCC) substantial fishery data and a trend based stock assessment are available but no reference points are defined. Spawning stock biomass showed a decreasing trend in recent years, and the stock is considered overfished. Fishing pressure has increased, that the stock is likely to be fished at a rate that is preventing its recovery. A subfished state for NCC is in place since 2011, but the resolutions have not been implemented.	Detailed analysis is attached WWF-CAM assessments cod cod			
Principle 2 - Minimising environmental impacts						
2.1.1 - Primary species subsistence						
2.1.2 - Primary species management						
2.1.3 - Primary species information						
2.2.1 - Secondary species subsistence						
2.2.2 - Secondary species management						
2.2.3 - Secondary species information	Impacts on ETP species are likely	Impacts on ETP species are likely by NEA cod fishery. In particular on elasmobranchs, reef/marine mammals and seabirds. Detailed WWF assessments of the different LUs please see attached CAM assessments	Detailed analysis is attached WWF-CAM assessments	65		
2.3.1 - ETP species outcome	Impacts on ETP species are likely	Impacts on ETP species are likely by NEA cod fishery. In particular on elasmobranchs, reef/marine mammals and seabirds. Detailed WWF assessments of the different LUs please see attached CAM assessments	Detailed analysis is attached WWF-CAM assessments	65		
2.3.2 - ETP species management	Impacts on ETP species are likely	Impacts on ETP species are likely by NEA cod fishery. In particular on elasmobranchs, reef/marine mammals and seabirds. Detailed WWF assessments of the different LUs please see attached CAM assessments	Detailed analysis is attached WWF-CAM assessments	65		
2.4.1 - Habitats outcome	A condition has to be raised. Damage on VMEs is not strictly	Bottom trawl: Please review the recent risk assessment for VMEs the trawling area (Nordkal, Minsterland, 2019). The identification of VMEs types differ for example soft bottom sponge grounds seem missing in the assessment. The percentage and VME communities overlapping with fishing in the Norwegian EEZ exceeds by far 20% compared input as we are assuming that heavily trawled areas are not VMEs. The report concluded that bottom trawling related fisheries have the human activities that were identified as the biggest threat to the VMEs. The Norwegian NEA cod fleet continues to operate in areas that were identified as vulnerable biotopes by Monaco and which were reported to OSPAR as threatened and protected seabed. The fleet did not conduct a footprint analysis of its activity. The fleet did not not participate in data collection of benthic bycatch species like other MSC certified similar fleets in the region (e.g. FULN, AGADRA) although this is legally binding (see comments P.3.2.3). FULN final certification report recorded frequently encounters with VME indicator species. Bycatch sampling is preconditions to evaluate impact, locate unidentified VME areas and to develop science based management. Move on rules. Please review ground-discrimination echo sounders which can distinguish between sand or hard rock, coral and sponges. To our knowledge distinguishing VMEs like sponges or corals is impossible even for scientific vessels equipped with the most modern echo sounders. WWF welcomes the actions by the fishery to support the closure of new areas around Brabant. However, compared to the on-visit overlap of the fleet with VMEs these areas are negligible and do not cover many hotspot VMEs areas identified in the trawling area. harmonize scoring with Norwegian deepwater prawn. Other Gear: CAB scores are too high, please see WWF CAM assessment regarding benthic habitat impact & management	Vulnerable marine ecosystems (VMEs) Coral and sponge VMEs in Arctic and Sub-Arctic waters – Distribution and threats Nordkal, Minsterland, 2019, p. 144 (see TOR/Forum, ISBN 906846622) 2019-019	65		
2.4.2 - Habitats management strategy	A condition has to be raised.	Bottom trawl: Please review and harmonize VME assessments and mitigation measures with other similar fleets. E.g. voluntarily an extension of Monaco/OSPAR VMEs habitat. Observe on overlap. WWF will continue reporting by them gear and natural specific move on rules. final footprint analysis overall coverage. Other Gear: CAB scores are too high, please see WWF CAM assessment habitat & management at gear. SA 15.6 for LUs encountering VMEs, scoring issue (p. 4) at the 5000 level should at least include the following information: D. Catch and catch rates of VME-indicator organisms and information to support the scientific definition of precautionary trigger levels, where these are used. Not in place see comments in 3.2.3.	FIUN FCLR, Agula FCLR, DFFU/Geotank FCLR	65		
2.4.3 - Habitats information	A condition should be raised	Bottom trawl: Please review and harmonize VME assessments and mitigation measures with other similar fleets. E.g. voluntarily an extension of Monaco/OSPAR VMEs habitat. Observe on overlap. WWF will continue reporting by them gear and natural specific move on rules. final footprint analysis overall coverage. Other Gear: CAB scores are too high, please see WWF CAM assessment habitat & management at gear. SA 15.6 for LUs encountering VMEs, scoring issue (p. 4) at the 5000 level should at least include the following information: D. Catch and catch rates of VME-indicator organisms and information to support the scientific definition of precautionary trigger levels, where these are used. Not in place see comments in 3.2.3.	WWF CAM assessments	75		
2.5.1 - Ecosystem outcome						
2.5.2 - Ecosystem management strategy						
2.5.3 - Ecosystem information						
Principle 3 - Effective management						
3.1.1 - Legal and/or customary frameworks						
3.1.2 - Consultation, roles and responsibilities						
3.1.3 - Long term objectives						
3.2.1 - Fishery-specific objectives						
3.2.2 - Decision-making processes						
3.2.3 - Compliance and enforcement	Bycatch reporting Norwegian Regulation 2-215-2011 evidence of compliance are not applied	1) Regulation J215-2015 states that all living corals and sponges are to be reported by the fishing vessels. This goes into effect from 1 kg corals and 1 kg sponges. To our knowledge there is a systematically non-compliance with this regulations and daher the not report catches of VME indicator species. WWF highlighted this issue in 2017 (see attached document). Sanctions are not in place. The fish				

Coding options to be used by CABs

Options are provided in the tables below for CAB responses

The options in the blue shaded cells in this page are provided as drop-down selections in the main tables in the other pages. No other codes may be used in the coding cells.

Justifications for each of the values selected should be given in the relevant 'CAB response' columns in each table

CAB response coding

Table	Performance Indicator comments
Variable	PRDR CAB response code
Preamble	Stakeholder input is:
Coding options	Accepted (no score change) Accepted (score increased) Accepted (non-material score reduction) Accepted (material score reduction to <80) Accepted (material score reduction to <60) Not accepted (no score change)

Version control

Version	Date of publication
1,0	mandag 7. februar 2011
2,0	onsdag 15. april 2015
3,0	mandag 17. desember 2018

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