

Stakeholder contact and assessment details

Category	Contact details
Title	Mr
First name*	Yann
Last name*	Rouxel
Organisation*	The Royal Society for the Protection of Birds
Email*	yann.rouxel@rspb.org.uk
Department	
Job title	Bycatch Project Manager
Description	
Phone number	
Postal address	
Fishery name*	NFA Norway ling and tusk and NFA Norway lumpfish
Certification body (CAB)*	DNV GL
Register*	I wish to register as a stakeholder - please keep me informed about each stage of the assessment process

Performance Indicator (PI) input

Performance Indicator (PI)	Condition	Input summary	Input detail	Evidence or references	Stakeholder input code	CAB response to stakeholder input	CAB response code
Performance Indicator - please copy and insert rows to raise more than one input against a Performance Indicator	If relevant, please provide the associated condition - please copy and insert rows to raise more than one input against a condition	Summary sentence	Detail of stakeholder input	Objective evidence or references should be provided in support of any claims or claimed errors of fact.	Please assign an input code to describe the suggested change based on your input and evidence. Optional. See the Codes section for a description of the codes.	The CAB shall respond in this column. CAB responses should include details of where different changes have been made in the report (which section #, table etc).	The CAB shall assign a response code to each row completed by the stakeholder.
Principle 2 - Minimising environmental impacts							
2.3.1 - ETP species outcome			On p.83 of the Announcement Comment Draft Report, it is said that <i>"NINA stated that in 2020 there was an increase in self-reporting of bycatch, which could be related to cooperation with Norges Fiskarlag who distributed information about why fishers should report bycatch. Due to Covid-19, no external observers were used. Overall, NINA has concluded that the lumpfish fishery's total seabird impact is limited since the fishery is relatively small. NINA does not monitor seabird bycatch in the ling and tusk fisheries because the risk for catching seabirds in those fisheries are significantly less being offshore than the catch in the coastal gillnet fishery for lumpfish. Seabird bycatch will be reviewed in more detail at the site visit"</i> è We do not agree with NINA conclusions that the risk for catching seabirds in the Ling/Tusk fishery is necessarily less as being offshore. Those fleets operate in known bycatch hotspots for seabirds, notably in ICES areas IV-VI, where [see Northridge et al. 2020] and notably in the offshore Norwegian/Barents Seas where density of prone-to-bycatch species (e.g. Alcids for gillnets; Fulmars and Kittiwakes for Longlines) at sea and their colonies, is particularly high (see Barentsportal). Due to the dire conservation status of many of those recorded seabird species; including Endangered and Critically Endangered species in the Norwegian Red List; appropriate monitoring of seabird	Northridge et al. 2020; http://sciencesearch.defra.gov.uk/Document.aspx?Document=14932_ME6024PrelimestseabirdbycatchinUKfisheries19Oct2020rev.pdf http://www.barentsportal.com/barentsportal/index.php/en/status-2019/268-biotic-ecosystem-components-data-from-2018/marine-mammals-and-seabirds-2018/942-marine-mammals-and-seabirds			

		<p>bycatch, in all UoAs considered in this certification, is absolutely required. Gillnets and Longlines used in those UoAs have proven to be prone to bycatch seabird species in both Norwegian territorial waters, EEZ and other ICES areas (in particular around the Barents sea and around north Scotland/Faroes waters).</p>				
2.3.1 - ETP species outcome	Condition 3	<p>We do not agree that this condition is "On target" and is likely to meet the deadline of the 4th Surveillance. Condition 3 specifically mentions that <i>"The client shall introduce a system of recording ecological information on all the vessels [...]"</i>. However, thus far the Client has hardly progressed since Y2 and the possible development of an app to record bycatch; relying on a Norwegian new regulation that <i>"requires all fishing vessels to have VMS and the electronic reporting system (ERS) installed by 2023"</i>, starting with only the bigger vessels of the fleet. While we expect at the next Surveillance/Re-assessment that concrete proof of this new regulation is in place and delivering expected outcomes, we note that smaller vessels of the fleets won't be concerned until past the Condition deadline, and as such is hardly "On target". We also note that the condition states that <i>"Self-reporting is not sufficient, there is need for independent verification [...]"</i>. However, no improvement seems to have been made regarding systematic data collection of independent bycatch data. Unless important improvements have been made on those two aspects, we expect this Condition to fail to meet its deadline, and threaten Re-Assessment of this fishery.</p>				
2.3.1 - ETP species outcome	Condition 8	<p>Justification for Condition 8 includes <i>"There is no direct, independently verified bird bycatch data from the ling and tusk longline and gillnet fishery."</i>. Yet to date, no significant improvement has been made in regards to "introduce a system of recording bycatch information to species level " and to <i>"independent verification of this self-reported bycatch data through observers, reference vessels or cameras."</i> Thus, the same remarks than Condition 3 apply here, and we do not agree that the Condition is "On target" to meet its objectives/deadlines, and as such is likely to fail.</p>				

2.3.1 - ETP species outcome	Condition 11		Similarly to above comments, this condition fails to date to meet its objectives of implementing "an on-board recording system to measure trends in all ETP bycatch, including independent verification to be robust. [...]". In spite of Derogation 6 extending the deadline, we do not see to date any significant improvement in accurate and reliable data collection in this fishery.				
2.3.2 - ETP species management	Condition 4, 5 & 10		Those conditions have benefited from Derogation 6 (postponing deadline from SA 4 to 1st SA of Re-Assessment), and both have similar objectives to <i>roughly "Design and implement an on-board recording system to measure trends in [ETP species]" (including seabirds); and "to minimize interactions or eliminate mortalities"</i> , in particular in the Lumpfish fishery (Condition 4) by <i>"Design(ing) and implement a strategy to minimise seabird bycatch, including the development of technical mitigation to reduce seabird bycatch in gillnets."</i> We do not agree that conditions are <i>"On target"</i> , including C4 which considered at Y2 that consideration by the fishery to data collection indicates that <i>"development of a strategy is actively being pursued"</i> . Similarly, on Y3 (for Condition 4 stil), draft of a guide to technical measures does not <i>"provide continued evidence that the strategy is being implemented successfully, alternative measures reviewed, and is now part of the management of the fishery, as a matter of course."</i>				
2.3.2 - ETP species management	Condition 9		We do not agree that the client has provided to date, real evidence that a strategy for managing and minimizing bycatch of ETP species (notably seabirds) is being implemented or already in place. Since Y2, we do not consider that specific progress has been made from "consideration and implementation of bird scaring devices on the longliners ", or that evidence has been provided that " to show why it is not necessary". A draft guide of technical measures, cannot by itself constitutes proof of a successfully implemented strategy to minimize seabird bycatch, with no indication of effectiveness of considered measures (research trials), uptake and compliance for use, etc.				

General comments

General comments	Evidence or references	CAB response to stakeholder input	CAB Response Code
<p>General comments on the surveillance audit</p> <p>Stakeholders should note that input is most useful for assessment teams when attributed to an MSC Performance Indicator, condition or milestone, and when objective evidence and references are provided in support of any claims or claimed errors of fact.</p>	<p>Objective evidence or references should be provided in support of any claims or claimed errors of fact.</p>	<p>CABs should respond in this column.</p> <p>CAB responses should include details of where different changes have been made in the report (which section #, table etc).</p>	<p>The CAB shall assign a response code to each row completed by the stakeholder.</p>
<p>We regret that most of the Conditions set around bycatch of ETP species (in particular seabirds), around a) appropriate data collection and b) mitigation actions have been so far considered "On Target" by the CAB, whilst falling short from the set objectives. We regret a lack of ambition towards practical actions & outcomes from the Client, and - unless significant improvements can be demonstrated during the next SA/Re-Assessment - we consider that most of those Conditions are at risk of failure, potentially challenging the re-assessment of this fishery .</p>	<p>See PI input Tab 2</p>		