

# MACALISTER ELLIOTT AND PARTNERS LTD

## SURVEILLANCE VISIT REPORT FOR EURONOR AND CIE DES PECHES ST. MALO COD AND HADDOCK FISHERY (*GADUS MORHUA* AND *MELANOGRAMMUS AEGLEFINUS*)

CERTIFICATE CODE: MEP-F-008/9

SURVEILLANCE YEAR 2

Undertaken by:

Jo Gascoigne (Team Leader)  
&  
Chrissie Sieben

3<sup>RD</sup> APRIL 2014



MacAlister Elliott and Partners Ltd  
56 High Street, Lymington  
Hampshire SO41 9AH  
United Kingdom

Tel: 01590 679016

Fax: 01590 671573

E-mail: [mep@macalister-elliott.com](mailto:mep@macalister-elliott.com)

Website: [www.macalister-elliott.com](http://www.macalister-elliott.com)

## 1. GENERAL INFORMATION

Fishery Name	Euronor and Cie des Pêches St Malo Arctic cod and haddock			
Unit of Certification	The Euronor and Cie des Pêches St. Malo demersal otter trawl fishery for cod ( <i>Gadus morhua</i> ) and haddock ( <i>Melanogrammus aeglefinus</i> ) from the and Northeast Arctic stocks (ICES Subareas I and II).			
Species	cod ( <i>Gadus morhua</i> ), haddock ( <i>Melanogrammus aeglefinus</i> )			
Area	ICES Subareas I and II (NE Arctic), including the Norwegian EEZ (NEZ) and the Svalbard Fisheries Protection Zone (SVA, SFPZ)			
Method of capture	Demersal trawl			
Client Address	<p>Le Comptoir des Pêches d'Europe du Nord or Euronor 13 Rue Huret Lagache, BP447 - 62206 Boulogne sur mer, Cedex France</p> <p>Companie des Pêches St. Malo 40 quai Duguay Trouin – BP 64 35406 SAINT-MALO Cedex</p>			
Client Contact Name	Bruno Leduc (Director), Martine Edouard-Leborgne (Directeur Achats)			
Client Telephone No.:	+33 (0)3 21 10 95 95 (Euronor), +33 (0)2 99 20 51 51, (Cie des Pêches)			
Client Email	<a href="mailto:euronor@euronor.fr">euronor@euronor.fr</a> , <a href="mailto:administratif@cie-peches-saintmalo.com">administratif@cie-peches-saintmalo.com</a>			
Certificate number	MEP-F-008 (Compagnie des Pêches St. Malo) and MEP-F-009 (Euronor)			
Certificate Issue Date	17 April 2012			
Certificate Expiry Date	16 April 2017			
Audit stage	Year 1	Year 2	Year 3	Year 4
Audit experts	<p>Expert 1 (Team Leader): Dr Jo Gascoigne</p> <p>Expert 2: Chrissie Sieben</p>			
Surveillance Audit Date	3 April 2014			
Conclusion	Euronor and Cie des Pêches St. Malo <b>should</b> retain MSC certified status for their North Sea and Northeast Arctic saithe for another year.			

## 2. INTRODUCTION

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This report outlines the process and outcome of the second annual surveillance audit for the MSC certified fishery ‘Euronor and Cie des Pêches St. Malo cod and haddock’. The fishery is conducted by the fishing company Euronor, based in Boulogne-sur-mer, France, and the fishing company Compagnie des Pêches St. Malo, based in St. Malo, France.

For Euronor, the main activity is the North Sea saithe fishery, but the company has two freezer vessels (the Cap Nord and the Klondyke ) which are able to operate in the Northeast Arctic (NEZ and SFPZ), targeting primarily cod, with some bycatch of haddock in both areas and saithe in the NEZ. This activity is limited by availability of Northeast Arctic cod quota to the company, and generally includes 1-2 trips per year for each vessel, of 30-45 days each.

Cie des Pêches St. Malo is involved in several fisheries with different vessels, but has one vessel, the Grande Hermine, whose primary activity is in this fishery. She undertakes generally 3 trips per year of 60-90 days each in the NEZ and SFPZ, again targeting cod with some bycatch of haddock and saithe, as above. In some years the Grande Hermine has fished a small amount for saithe in the North Sea, but in recent years this has not happened because of a lack of quota.

This audit is the second annual surveillance audit for this fishery since certification – which was finalised in April 2012. The audit was carried out by telephone, to Euronor on 3 April 2014 and the Cie des Pêches on 22 April 2014, by the surveillance team consisting of Dr. Jo Gascoigne (Team Leader) and Chrissie Sieben.. Please note that the surveillance level was reduced to remote surveillance, based on the argument that the fishery is low-risk and that all information required for the surveillance audit could be provided remotely. To view the corresponding variation request and MSC response, please visit this [link](#).

The fishery was certified with one condition, relating to habitat impacts (PI 2.4.1). This condition, and the client action plan, is considered in detail below.

Stakeholders were informed of the scheduled site visit, its time and location and the proposed audit team on the 19<sup>th</sup> March 2014. Comments were received from WWF Germany relating to habitat impacts, which are considered in detail below and presented in Annex 1, with supporting material in Annex 2.

The fishery remains in conformance with the Scope Criteria relating to unilateral exemption and destructive fishing practices (Certification Requirements v1.3, Section 27.4.4)

### 3. GENERAL OBSERVATIONS

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The vessels in the UoC changed during 2012 and 2013 because the Nordic II left Euronor's fleet at the end of 2012.

The revised list of vessels for this UoC is given in Table 1.

**Table 1. Updated list of vessels in the UoC**

Company	Vessel	LOA (m)	GRT	Type	Gear type
Euronor	Cap Nord	54.55	1492	Freezer	Single otter trawl
	Klondyke	54.55	1491	Freezer	Single otter trawl
Cie des Pêches St. Malo	Grande Hermine	61.55	1595	Freezer	Single otter trawl

### 4. PRINCIPLE 1

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#### 4.1. CATCHES AND QUOTA

Catches of cod and haddock in 2013 for both client groups are shown in and Table 3.

**Table 2. Total landings of cod by Cie des Pêches St. Malo and Euronor vessels (live weight tonnes) in 2013 in the Northeast Arctic (ICES Sub-Areas I and II). The total TAC for the fishery and the corresponding client share are also shown.**

Company		2013, tonnes live weight
TACs and quotas	TAC I and IIb	986,000
	EU share I and IIb (SVA)	37,172
	EU share I and IIb (NEZ)	19,971
Cie des Pêches St. Malo	Catch	4,717
	Client share of TAC	3,187 (SVA) + 1,532 (NEZ)
Euronor	Catch	3,156
	Client share of TAC	4,305 (SVA) + 3,570 (NEZ)

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**Table 3. Total landings of haddock by Cie des Pêches St. Malo and Euronor vessels (live weight tonnes) in 2012 and 2013 in the Northeast Arctic (ICES Sub-Areas I and II). The total 2013 TAC for the fishery and the corresponding client share are also shown. Note that there is no TAC for haddock in the Svalbard zone.**

Company		2012	2013
TACs and quotas	EU share I and IIb (NEZ)	1350	1481
Cie des Pêches St. Malo	Catch	173*	156*
	Client share of TAC	120	132
Euronor	Catch	150*	177*
	Client share of TAC	131	301

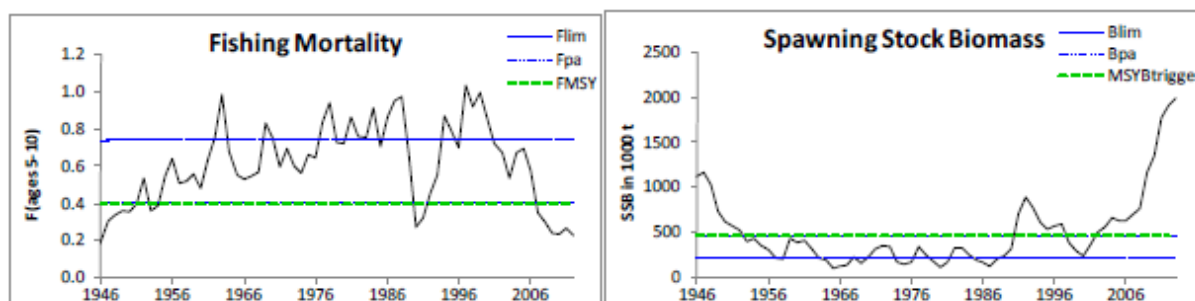
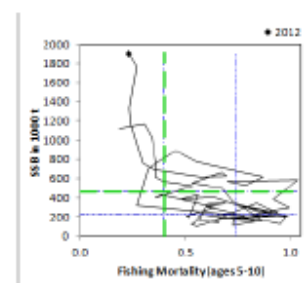
\* NEZ+SVA – note quota for NEZ only.

### 4.2. NORTHEAST ARCTIC COD

Northeast Arctic cod is considered by ICES to be within the appropriate reference points and harvested sustainably. A summary of the advice is given in Figure 1 below. The audit team decided that no action was needed.

#### Stock status

F (Fishing Mortality)			
	2010	2011	2012
MSY ( $F_{MSY}$ )	✓	✓	✓ Appropriate
Precautionary approach ( $F_{pa}, F_{lim}$ )	✓	✓	✓ Harvested sustainably
Management plan ( $F_{MP}$ )	✓	✓	✓ Below target
SSB (Spawning-Stock Biomass)			
	2011	2012	2013
MSY ( $B_{trigger}$ )	✓	✓	✓ Above trigger
Precautionary approach ( $B_{pa}, B_{lim}$ )	✓	✓	✓ Full reproductive capacity
Management plan ( $SSB_{MP}$ )	✓	✓	✓ Above trigger



**Figure 1. Summary of June 2013 ICES advice for Northeast Arctic cod, as well as trends in F and SSB (ICES, 2013a).**

### 4.3. NORTHEAST ARCTIC HADDOCK

The 2013 ICES advice for Northeast Arctic haddock indicates a deterioration in fishing mortality, with  $F$  above both  $F_{MSY}$  and  $F_{pa}$  (Figure 2). SSB however remains well above the trigger reference point. In line with the management plan, ICES advises that catches for 2014 should be no more than 150,000 tonnes (ICES, 2013b). The audit team considered that this stock continues to be harvested sustainably and no action is therefore needed.

#### Stock status

	F (Fishing Mortality)		
	2010	2011	2012
MSY ( $F_{MSY}$ )	✓	✗	✗ Above target
Precautionary approach ( $F_{pa}, F_{lim}$ )	✓	✓	⚠ Increased risk
Management plan ( $F_{MP}$ )	✓	✗	✗ Above target

	SSB (Spawning-Stock Biomass)		
	2011	2012	2013
MSY ( $B_{trigger}$ )	✓	✓	✓ Above trigger
Precautionary approach ( $B_{pa}, B_{lim}$ )	✓	✓	✓ Full reproductive capacity
Management plan ( $SSB_{MP}$ )	✓	✓	✓ Above trigger

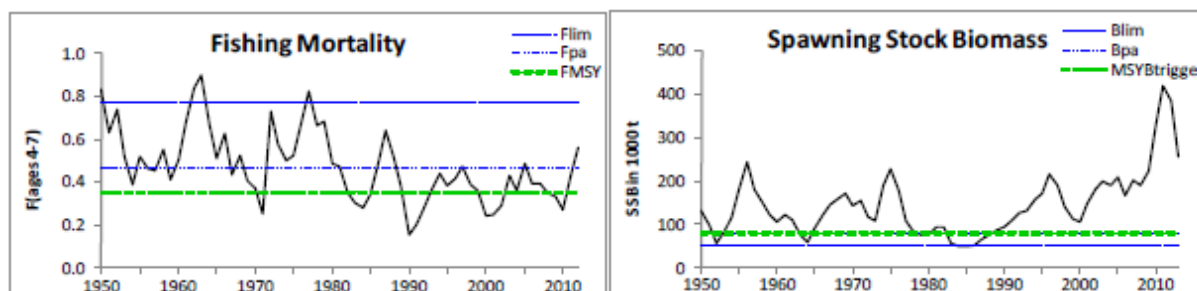
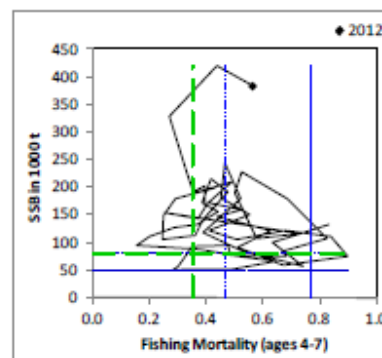


Figure 2. Summary of June 2013 ICES advice for Northeast Arctic haddock, as well as trends in  $F$  and SSB (ICES, 2013b).

## 5. PRINCIPLE 2

### 5.1. GENERAL OBSERVATIONS

Details of catches and discards are given in the sections below. Both companies reported no significant changes in catch patterns during 2013.

In 2013, vessels fishing in the Fisheries Protection Zone around Svalbard were subject to a bycatch regulation of 15% haddock per trawl - note that this was 19% per trawl in 2012 - and up to 20% redfish per trawl.

For vessels fishing in the Economic Zone of Norway and the Fisheries Zone around Jan Mayen, the following bycatch regulations (relevant to this fishery) applied in 2013:

- Redfish (*Sebastes mentella* and *S. marinus*): a bycatch of up to 20% by weight of redfish is permitted in individual catches and in the catch landed (this was 15% in 2012).
- Greenland halibut (*Reinhardtius hippoglossoides*): an intermixture of up to 7% is permitted in the catch on board at the end of fishing operations and in the catch landed. A bycatch of up to 12% is permitted in individual catches (as in 2012).

### 5.2. RETAINED SPECIES

Note: For Euronor, retained species were sorted into the Northeast Arctic fishery (under consideration here) and the North Sea fishery (under consideration as part of the certification of Euronor saithe but not considered here) at latitude 62°N, rather than at the boundary of ICES Divisions IIa and IVa, which is slightly further south. This is because TACs for North Sea stocks tend to cover Divisions IIa as well as Subarea IV, and because the boundary between the stocks is taken to be at this point for assessment purposes. In addition, VMS data show that the activity relating to the North Sea fishery (e.g. around Shetland) tends to span the boundary between IVa and IIa, dipping into the south of Division IIa.

The total retained species volume by Euronor is shown in Table 4 below. No significant departures from the 2009 - 2010 situation were noted, other than those that can be accounted for by a more accurate method of dividing North Sea and Northeast Arctic catch, as noted above. No 'main' retained species were identified for 2013.

**Table 4. Retained species for Euronor vessels the Cap Nord, Klondyke and Nordic II in the Northeast Arctic (ICES Sub-Areas I and II) in tonnes live weight, for 2009-13.**

Common name	Scientific name	2009	2010	2012	2013	% of total catch (2013)
Saithe*	<i>Pollachius virens</i>	102	25.6	162	0.65	0.02
Redfish	<i>Sebastes</i> spp.	9.95	0.26	9.2	10.3	0.31
Wolffish	<i>Anarhichas lupus</i>	3.72	0	7.2	15.1	0.45
Ling	<i>Molva molva</i>	1.61	0	0.8	0	
Atlantic halibut	<i>Hippoglossus hippoglossus</i>	0.417	0.16	0	0	
Greenland halibut	<i>Reinhardtius hippoglossoides</i>	0.248	0	6.9	16.4	0.48
American plaice	<i>Hippoglossoides platessoides</i>	0	0	3.9	6.65	0.20

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Common name	Scientific name	2009	2010	2012	2013	% of total catch (2013)
Ratfish	Chimaeridae	0	0	0.7	0	
Pollack*	<i>Pollachius pollachius</i>	0.219	0	0	0	
Hake*	<i>Merluccius merluccius</i>	0.137	0	0.6	0	
Tusk	<i>Brosme brosme</i>	0	0	0.3	0	
Monkfish	<i>Lophius piscatorius</i>	0.085	0	0.1	0	
Various		0.053	2.13	0.2	0.18	0.01
Greater argentine	<i>Argentina silus</i>	0	0	0.1	0	
Grey gurnard	<i>Eutrigla gurnardus</i>	0	0	0.05	0	

\* estimates of these species in previous years may have included some catch from Division IIa south of 62°N, which are considered part of the North Sea stock – see note above.

The total retained species volume by the Compagnie des Pêches St. Malo vessel (the Grande Hermine) is shown in Table 5 below. Unlike last year, saithe does not meet the 5% threshold for inclusion as a ‘main’ retained species – in any case, this fishery is also MSC-certified.

**Table 5. Total retained species volume by the Compagnie des Pêches St. Malo vessel, the Grande Hermine, in 2009-13 (tonnes live weight).**

Common name	Scientific name	2009	2010	2012	2013	% of total catch (2013)
Saithe	<i>Pollachius virens</i>	221	150	188	159	3.1
Redfish	<i>Sebastes mentella</i>	9.72	12.1	4.1	4.0	0.08
Other	-	12.26	17.76	9.5	23.3	0.46

The ‘other’ category corresponds mainly to ling (*Molva molva*), catfish (*Anarichas lupus*), Greenland halibut (*Rheinhardtius hippoglossoides*) and whiting (*Merlangius merlangus*). These species are not considered to be ‘main’ retained species.

### 5.3. DISCARDED BY-CATCH

There is no discarding associated with this fishery, since it takes place in Norwegian waters where discarding is forbidden (see [Public Certification Report](#) (PCR)). Discarding is strictly controlled by the Norwegian authorities. As no warnings or sanctions were raised with regards to discards, the audit team was satisfied that this continues to be a virtually discard-free fishery.

### 5.4. ETP SPECIES

As detailed in the PCR for this fishery, the key interaction with an ETP species in northeast Atlantic trawl fisheries in general is with the common skate (*Dipturus batis*). The assessment team for this fishery considered, however, that the common skate has very limited overlap in its distribution with this fishery (see PCR). However, observer reports from other, similar, fisheries, report some bycatch of common skate (see UK Fisheries Ltd, DFFU and Doggerbank cod, haddock and saithe fishery, [Surveillance Report 2](#)). It is not yet clear whether this represents a change in the distribution of this species (or species complex), a rare event or a problem of identification (or whether there is some other explanation). In any case, neither Euronor nor Compagnie des Pêches St. Malo reported any interaction of this species with the Northeast Arctic fishery, and both have a company policy in relation to



elasmobranchs – self-reporting of all catch under an Ifremer scheme in the case of Cie des Pêches, and discarding of all elasmobranchs in the case of Euronor. For the Grande Hermine, no elasmobranchs were captured.

## **5.5. HABITATS AND ECOSYSTEMS**

There has been no change in the activities of the vessels or the regulations pertaining to habitats since last year's audit. A condition was raised at certification on this issue, which is considered below.

MEP received comments from WWF on this issue, which are given in full in Annex 1. In summary they noted that i) detailed data on areas of operation of this fishery have not been analysed in their assessment of habitat impacts, but that other, similar fisheries were likely to have an impact on VMEs; and ii) existing rules (closed areas and the move-on rule) may not be precautionary, and the move-on rule no longer conforms to best practice elsewhere (NEAFC, NAFO). They also provided a report (Christiansen 2013 – Annex 2) which offered a critique of the scoring in relation to habitats for the various MSC-certified demersal trawl fisheries in this area, as well as an analysis of the overlap of these fisheries with known VME areas. Although this fishery was not included in that analysis (according to WWF's letter), it is clear that overall, taking all the demersal trawl fisheries in the area into account, there is most likely some overlap between trawling and VMEs.

Unfortunately, no observer trips were carried out aboard any of the vessels included in the UoC, for two reasons: i) the relatively long trips make it near impossible to recruit observers and ii) the fishery is not considered a priority by the French ObsMer observer programme, which in relation to distant-water trawl fisheries focuses mainly on the more controversial deep-water trawl fishery. The captains of the vessels concerned report that they very rarely, if ever, bring up benthos in the trawl, and that since it was introduced, the move-on rule has never been triggered. This can be interpreted in a variety of ways: i) there is no overlap with VMEs, ii) there may be damage *in situ* which is not brought up in the trawl, iii) the captain is not aware when small amounts of benthos come up in the trawl or iv) benthos in the fishing area has been eradicated by trawling.

MSC are introducing a requirement for MSC-certified fisheries operating the same gear in the same area to consider cumulative impacts on vulnerable habitats as part of the scoring. The introduction of this measure, foreseen to be during 2014, will require considerable efforts among all the CABs with certified trawl fisheries in this area to decide on harmonised scores and, if necessary, conditions, under these new requirements. On this basis, MEP concluded that the most appropriate response to WWF's comments would be to incorporate their analysis into this harmonisation process. (The CABs in question were approached regarding this harmonisation, and provided with WWF's comments, as part of the audit process but none of them responded.)

In the meantime, MEP acknowledges that better information could be provided on overlap with vulnerable habitats in this fishery, particularly for the Grande Hermine, where VMS data have never been included in the assessment (unlike for Euronor) – this was because Cie des Pêches de St. Malo do not acquire the Grande Hermine's VMS data in their own offices. On this basis, Cie des Pêches has provided VMS tracks for the last 6 months, which were

obtained from the French authorities. This information is given in Annex 2 and provides an initial basis for the type of analysis that WWF are asking for. This issue will be followed up in the timetable of the new Certification Requirements, or at the latest before the next surveillance audit.

## **6. PRINCIPLE 3**

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No significant changes were identified in Principle 3. Marine Scotland Compliance in Peterhead (where Euronor vessels land their catch relatively frequently) reported no compliance issues and a cooperative attitude from the company (Craig Paterson, Marine Scotland Compliance, pers. comm., 3 April 2014).

The Grande Hermine received a warning from the Norwegian authorities for failing of the electronic catch reporting system, meaning that a daily deadline for reporting of catch to the Norwegian authorities was missed.

## **7. TRACKING AND TRACING OF FISH PRODUCTS**

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The Grande Hermine does not pose a risk to the chain of custody (CoC) as she only fishes in the Northeast Arctic for cod and haddock. Although there is the possibility that cod and haddock could be caught as bycatch when fishing for saithe in the North Sea, the Grande Hermine did not have any quota for North Sea saithe in 2012 and therefore this did not pose a risk to the CoC.

The only risk to the chain of custody as identified by the initial assessment team in the PCR relates to the fact that Euronor vessels may land MSC and non-MSC same species product on the same fishing trip. North Sea cod is currently caught as a by-catch to the North Sea saithe fishery, and this by-catch is not MSC certified. However, all MSC catch aboard Euronor vessels is stored separately and bears the MSC label. All Euronor frozen product is landed in Boulogne and stored in a cold store by Euronor Distribution, which has separate Chain of Custody certification.

## 8. CONDITIONS AND ACTION PLAN

The most important aspect of the annual audit is to assess progress with the Action Plan towards meeting the conditions. Euronor and Compagnie des Pêches St. Malo were certified with one condition, which is further detailed in Table 6 below.

**Table 6. Condition on habitat outcome – DFFU/Doggerbank**

PI	2.4.1
Condition	The fishing companies should review recent information on sensitive benthic habitats in their fishing area (notably from the MAREANO project), and also review any evidence that their activities are causing damage to these habitats (benthos attached to the trawl). If this information suggests that activities are damaging to vulnerable communities, then they should take steps to reduce these impacts such that serious or irreversible harm on a bioregional basis is ‘highly unlikely’.
Requirement for Year 1	The first formal milestone for this condition was set at the end of Year 2, when data collection and review should be completed.
Action Plan Year 1	<p>The following plan has been developed to avoid interactions of the fishing activities with sensitive habitats:</p> <p>NB : It is important to note that the exact timing of activities depends on how the fishing trips to the Arctic are planned. For the moment the companies’ timetables are as set out below, but external factors can always cause these to change:</p> <p>Euronor : Svalbard and NEZ the last three months of 2012.</p> <p>Cie des Pêches St. Malo : NEZ – March to May; Svalbard – July to August</p> <p>- Year 1 (2012)</p> <p>January – June 2012 : Identify existing sources of information on sensitive habitats (notably MAREANO), and consult regularly to confirm the positions of sensitive areas, which possible changes over time.</p> <p>March – August 2012 : Fishing (Cie. Pêche St. M.)</p> <p>June – October 2012 : Identify the most recent positions of sensitive habitat areas</p> <p>October – December 2012 : Fishing (Euronor)</p> <ul style="list-style-type: none"> <li>End 2012 : Discuss with the fishing skippers after each trip in the Arctic, any possible interactions with sensitive habitats during cod and haddock fishing</li> </ul>
Actions during Year 1	<p>Both companies regularly verify the positions of sensitive areas – either through the website MAREANO or by consulting the Norwegian authorities prior to commencing a fishing trip. In addition, as of the 1<sup>st</sup> September 2011, new Norwegian regulations on the protection of vulnerable benthic habitats came into force (see below and in the Annex). These are adhered to by both company vessels as ensured by the strict Norwegian inspection regime.</p> <p><i>Purpose and scope</i></p> <p>The purpose of these regulations is to protect vulnerable benthic habitats; they apply</p>

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	<p>to bottom fishing activities in the Economic Zone of Norway, the fisheries zone around Jan Mayen and the Fisheries Protection Zone around Svalbard.</p> <p><i>Definitions</i></p> <p>For the purpose of these regulations, the following definitions apply:</p> <ul style="list-style-type: none"> <li>a) bottom gear: fishing gear that in the normal course of fishing operations is likely to contact the seabed;</li> <li>b) existing fishing areas: areas where the water depth is less than 1000 metres, see the scope set out in section 1. A map of these areas is available on the website of the Directorate of Fisheries, <a href="http://www.fiskeridir.no">www.fiskeridir.no</a>;</li> <li>c) new fishing areas: areas where the water depth is more than 1000 metres, see the scope set out in section 1;</li> <li>d) encounters: cases where the quantity of indicators of vulnerable benthic habitats per catch (trawl tow, longline set, or gillnet set) exceeds 60 kg of live coral and/or 800 kg of live sponge.</li> </ul> <p><i>Fishing in existing fishing areas:</i></p> <p>For each catch, the vessel shall calculate the quantity of indicators of vulnerable benthic habitats, as live coral and live sponge.</p> <p>If the calculation indicates an encounter, the vessel shall without delay do as follows:</p> <ul style="list-style-type: none"> <li>a) report the encounter to the Directorate of Fisheries, including the location and the type of habitat encountered, and</li> <li>b) cease fishing activities and relocate to a position at least two nautical miles from the position that on the basis of all available information is probably closest to the vulnerable benthic habitat that has been identified.</li> </ul> <p><i>Fishing in new fishing areas:</i></p> <p>Vessels must hold a special permit from the Directorate of Fisheries to fish in new fishing areas.</p> <p>A special permit may only be issued if the vessel has submitted the following to the Directorate for approval:</p> <ul style="list-style-type: none"> <li>a) a detailed protocol for the exploratory fishery, including a harvesting plan describing fishing gear, target species, bycatches, dates and areas, and</li> <li>b) a mitigation plan for avoiding damage to sensitive marine ecosystems, and</li> <li>c) a plan for log-keeping and reporting, and</li> <li>d) a plan for collection of data on vulnerable benthic habitats.</li> </ul> <p>For each catch, the vessel shall calculate the quantity of indicators of vulnerable benthic habitats, as live coral and live sponge.</p> <p>If the calculation indicates an encounter, the vessel shall without delay do as follows:</p> <ul style="list-style-type: none"> <li>c) report the encounter to the Directorate of Fisheries, including the location and the type of habitat encountered, and</li> <li>a) cease fishing activities and relocate to a position at least two nautical miles from the position that on the basis of all available information is probably closest to the vulnerable benthic habitat that has been identified.</li> </ul> <p>The Directorate of Fisheries may lay down a requirement for a vessel to carry an observer when fishing in new fishing areas. The costs associated with carrying an observer on board, including wage costs, and also any interest on overdue payments, transport to and from the vessel, and board and lodging while at sea, shall be covered by the owner of the vessel.</p>
Evidence	Regulations relating to bottom fishing activities in the Economic Zone

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provided during Year 1 Audit	of Norway, the fisheries zone around Jan Mayen and the Fisheries Protection Zone around Svalbard (See Annex); VMS tracks confirming fishing activities take place outside areas of sensitive or protected habitats.
Conclusion of Year 1 Audit	The audit team concluded that the 1 <sup>st</sup> year of the Client Action Plan had been implemented by both companies. The implementation of the regulation mentioned above is also significant step further in meeting this condition. Progress against this condition was therefore considered to be <b>ahead of target</b> .
Requirement for Year 2	Data collection and review should be completed by the end of Year 2.
Action Plan Year 2	<p>1<sup>er</sup> semestre : Mise en place d'une stratégie de limitation des impacts éventuels, inscrite dans les instructions au capitaine pour chaque campagne de pêche en arctique. Fin 2013 : Bilan des actions de pêche en 2013, en ce qui concerne les interactions éventuelles de la pêche avec les habitats sensibles. Fixation d'objectifs et de moyens pour réduire ces interactions éventuelles.</p> <p>(First 6 months : Strategy put in place to limit possible impacts, written into the skippers' instructions for each fishing campaign in the Arctic. End 2013 : Review of fishing activities in 2013 in relation to possible habitat impacts. Definition of objectives and means to reduce these impacts as necessary. )</p>
Actions during Year 2	Both companies regularly verify the positions of sensitive areas – either through the website MAREANO or by consulting the Norwegian authorities prior to commencing a fishing trip. The move-on rule for habitats came into force at the end of 2011, but has never been triggered by any of the vessels in the UoC. It is reported by skippers that it is rare to encounter benthos in the trawl – it may be on this basis that the move-on rule is insufficiently precautionary (as WWF consider) or that vulnerable benthos is not (or no longer) found in the fishing area. Areas which in the past have yielded catches of sponges are marked and avoided, because they cause damage and loss of time.
Evidence provided during Year 2 Audit	Instructions to skippers, information from skippers (relayed via Bruno Leduc and Martine Edouard). VMS tracks (Cie des Pêches St. Malo)
Conclusion of Year 2 Audit	The review of data found no information that would suggest any impact on vulnerable habitats (nothing brought up in the gear). The strategy therefore remains to respect closed areas and to continue to monitor bycatch of benthos. This condition will be reviewed after the introduction of new Certification Requirements (as part of next year's audit at the latest). Meanwhile, based on the existing condition and action plan, progress is on target.

## 9. CONCLUSION AND CERTIFICATION RECOMMENDATION

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The audit team concluded that progress has been made to implement the condition, further to the Action Plan submitted by the companies. This fishery's progress is therefore considered to be **on target**. On the basis of the above, Euronor and Cie des Pêches **should** retain their MSC certification for Northeast Arctic cod and haddock for another year.

## 10. SURVEILLANCE SCORE

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In accordance with the Certification Requirements v1.3, the frequency of future surveillance visits was calculated for this fishery. The overall surveillance score is calculated by adding the scores from Table 7 and matching those with the Surveillance Level in

Table 8.

This fishery's score was calculated at 2, which implies a normal surveillance level with annual on-site surveillance audits.
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Table 7. Criteria to determine Surveillance Score

Criteria	Surveillance Score	Euronor Score
1. Default Assessment Tree used?		
Yes	0	0
No	2	
2. Number of conditions		
Zero conditions	0	0
Between 1 – 5 conditions	1	
More than 5	2	
3. Principle level Scores		
≥85	0	2
≤85	2	
4. Conditions on outcome PIs?		
Yes	2	0
No	0	

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<b>Total Score</b>	<b><u>2</u></b>
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**Table 8. Surveillance level**

			Years after certification or recertification			
Surveillance score (from Table C3)	Surveillance level		Year 1	Year 2	Year 3	Year 4
2 or more	Normal Surveillance		On-site surveillance audit	On-site surveillance audit	On-site surveillance audit	On-site surveillance audit & recertification site visit
1	Remote Surveillance	Option 1	Off-site surveillance audit	On-site surveillance audit	Off-site surveillance audit	On-site surveillance audit & recertification site visit
		Option 2	On-site surveillance audit	Off-site surveillance audit	On-site surveillance audit	
0	Reduced Surveillance		Review of new information	On-site surveillance audit	Review of new information	On-site surveillance audit & recertification site visit

## 11. ANNEX 1 – COMMENTS RECEIVED FROM WWF

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WWF Smart Fishing Initiative • Moenckebergstraße 27 • 20095 Hamburg

MacAlister Elliott & Partners  
58 High Street  
Lymington  
Hampshire  
SO41 9AH  
United Kingdom

WWF Global Fisheries Programme  
Smart Fishing Initiative (SFI)

Moenckebergstraße 27  
20095 Hamburg  
Germany  
pr: +49 40 530200-310  
Fax: +49 40 530200-313  
annika.mackensen@wwf.de  
www.panda.org/smartfishing

**WWF input: annual surveillance audit of the Euronor and Compagnie des Pêches St. Malo cod and haddock fishery**

April 2nd, 2014

Dear Chrissie Sieben, dear Tim Anderton-Tyers,

This letter is regarding the upcoming annual surveillance audit of the Euronor and Compagnie des Pêches St. Malo fishery. WWF actively engages as a stakeholder in a number of Marine Stewardship Council (MSC) fishery assessments and audits to improve fisheries sustainability.

We are involved in several MSC certification processes of cod fisheries in the Barents Sea, with a special focus on the impacts of trawling operations in vulnerable deep water habitats (MSC P 2.4). As you know, several sensitive vulnerable marine ecosystems (VMEs) exist in the region (e.g. cold water coral reefs, deep water sponge grounds, soft and hard bottom coral gardens and sea pen fields) and fishing activities of the cod fisheries overlapped with these ecosystems in the past. According to international agreements and guidelines (e.g. UNGA Resolutions 61/105 and 64/72, FAO "International Guidelines for Deep-Sea Fisheries" 2007), these VMEs need enhanced protection from adverse impacts. All the above mentioned VMEs in the Barents Sea are categorized as "declining or threatened" by OSPAR.

WWF commissioned a study to Dr. Sabine Christiansen, a deep water ecologist, to collect and to summarize the available data on VMEs in the Barents Sea, potential impacts of trawling operations, existing conditions and practices of MSC certified cod fisheries and international best practices guidelines. Please find attached the results of the study (Christiansen 2013).

Unfortunately, one of the results of the study was that generally the existing practice and MSC conditions of the fisheries do not seem to be sufficient in order to avoid serious and irreversible harm for several long lived benthic species (categorized as VME) in the region. Consequently, we conducted a spatial analysis in order to determine the extent to which there is an overlap between several MSC certified demersal trawl fisheries in the Barents Sea and to known VMEs using fishery location data from the Automatic Identification System (AIS) and MAREANO VME maps (see Christiansen study). The analyses showed that all analysed fisheries operated in areas with known VMEs following the MSC certification. However, we did not analyse Comapêche



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and Euronor vessels and, reading in your first annual surveillance report, were delighted that the fishery does not fish in areas with known VMEs. It seems that the Compapêche and Euronor fishery is an outstanding example of best sustainable practice. Therefore we looking forward to the upcoming annual surveillance report and we encourage you to publish the results of the data collection and review in detail. This might not only be a milestone for this certified fishery but also for all other similar MSC certified fisheries in the region. Of particular high interest are pieces of information and encounters of VMEs (benthos attached to the trawl) in areas not yet mapped by MAREANO (for example in the Svalbard area where VMEs are highly likely). Also highly interesting is the fishery response to the recently published MAREANO map, which indicates areas in the Norwegian EEZ where VMEs are likely to occur (after FAO definition).

([http://www.mareano.no/kart/viewer.php?language=en&bbox=-174909.8,7509200.0,1100307.8,8165220.0&KARTBILDE\\_ID=209](http://www.mareano.no/kart/viewer.php?language=en&bbox=-174909.8,7509200.0,1100307.8,8165220.0&KARTBILDE_ID=209))

We would also like to draw your attention to the advanced scientific knowledge and progressed discussion about the benthic bycatch thresholds which should trigger the “move on rule”. In light of the review results (we can send the respective literature in case of interest), the implemented thresholds of 60kg corals and 800kg sponges do not seem precautionary anymore and NEAFC already halved these thresholds in their jurisdiction area, while NAFO included a trigger of 7 kg bycatch of sea pens or soft corals.

We hope this is of interest and eagerly look forward to reading the annual surveillance report.

Kind regards



Dr Annika Mackensen

Fisheries Certification and Livelihoods Manager, WWF Smart Fishing Initiative

## 12. ANNEX 2 – VMS TRACE FOR THE GRANDE HERMINE

