



## **COASTS Comments on draft report on the MSC certification assessment.**

### **MSC Principles and Criteria for Sustainable Fisheries**

It is clear that the definition used in Principles 1 and 2 are very narrow and do not in any way consider the holistic and system led approach now considered essential when considering the issue of SUSTAINABILITY of specific species and the broader ecosystem on which it depends.

Principle 1. Fishery conducted so there is no over-fishing or depletion of exploited populations.

It is now clear from scientific studies both in Scotland and in other seas that Nephrops norvegicus has thrived because the fishing method, most especially with bycatch and discards as shown in the tables on page 18, has contributed to the elimination of the major predators of the stock. However, of further concern is the value of discards of the target species, with 77 million nephrops discarded annually in the North and South Minch fishery (2003-2005), representing 25% of the catch. The estimate gives a value of 75% mortality of these discards. These parameters as given, strongly suggest that in time the nephrops fishery will collapse. There appears little strategy to safeguard stocks of either “exploited” populations or bycatch. Clearly no sustainability in the true sense of the meaning, although short termism in sustaining profits might be applicable.

Principle 2. Maintaining the structure, productivity, function and diversity of the ecosystem.

Clearly this is not the case with the nephrops fishery. How the Certification came out with an overall 81% pass will be a mystery to any marine ecologist. Attention has been drawn to this whole area. The collapse of the white fish population on the west coast, and well documented in the Clyde has clearly strong links to nephrops trawling. The research shows up to 50% of catch in nephrops trawls is discarded and a large proportion is juvenile cod. It is clear that the

European Commission now supports this research and it is imperative that no credence is given by means of Certification which, by implication, suggests the nephrops fishery is doing no harm to the marine ecosystem.

The complexity of food chains, from plankton to fish to seals, dolphins and whales is increasingly under scrutiny. The potential impacts on cod and spurdog through bycatch and discards (quoted figures in the report are very disturbing) in the longer term suggests any form of certification would completely discredit MSC.

Whilst the report suggests that the problem of bycatch has been alleviated by the decline in fish abundance in the area, it is clearly probable that one is related to the other. To not make that possible connection in the report is to ignore the precautionary principle which is increasingly used as a baseline in determining what can safely be done in both EIAs on land and in the marine environment.

If this fishery is given Certification, the Clyde will be next in line. One of the difficulties, acknowledged in the report, is the insufficient research evidence. The figures in the report from the Clyde quoted 9kg of discards per kilogramme of nephrops landed. How much evidence do the certifiers require? Again the precautionary principle must be applied to those areas where insufficient research is available. The North and South Minch is just such an area.

Principle 3. The fishery is subject to an effective management system that respects local, national and international laws and standards and incorporates institutional and operational frameworks that require use of the resource to be responsible and sustainable.

The objection to this principle is that the sustainable only reflects on the target species, called by MSC exploited populations. Even here the push to improve effectiveness and efficiency in a global market which is pushing prices down, brings compromises and resistance to changes in the way the trawling, types of net etc are used. The greater ecological exploitation is not mentioned under Principle 3. Just before Christmas the other stakeholders in the Scottish marine environment witnessed the dealings by the nephrops trawling industry in Brussels which prevented the greater protection of the wider ecology of western Scotland. This surely points to further short term profit over the longer term protection of the environment. Responsible and sustainable this industry is not.

## CONCLUSION:

To give MSC Certification to the Stornoway Nephrops Trawl Fishery will discredit all that MSC has come to stand for. It is important with the new Scottish Marine Bill that the whole marine environment, not just a target species is considered holistically and systemically. Now that research shows that bycatch and discards do dramatically affect the ecology of the local marine environment and in turn further afield too, MSC must consider the short term and longer term strategy for everything affected. In which case Certification has to be denied. As an organisation that has fought for over 10 years to protect the Bay and its fragile maerl beds in Lamlash, Isle of Arran, from the exploitation of the marine environment through

overfishing, scallop dredging, and the short termism fishery industry, COAST (Community of Arran Seabed Trust).

[www.arrancoast.com](http://www.arrancoast.com) ) expects MSC to protect the wider concerns and interests of the many stakeholders in the marine environment. The report talks about the importance of the economy of the nethrops industry. The static fishermen and the marine tourist industry are also vital to the economy of western Scotland. The success of COAST in achieving the first Scottish No Take Zone this year shows that the stakeholders in the Scottish marine environment are alive to the issues which concern many about the exploitation of the marine environment. The use of the guise of “Certification” or Freedom Foods as marketing tools to differentiate products from their competitors, rather than a strategic environmental effort is becoming commonplace. The report suggests this is yet another example of “Greenwash”.

Dr Sally Campbell