

## FISHERY ANNOUNCEMENT AND STAKEHOLDER IDENTIFICATION

### Scapêche Roundnose grenadier, black scabbardfish and blue ling deep-sea fishery entering full assessment for Marine Stewardship Council certification

#### Motion by BLOOM Association

February 3rd, 2015

Your institution recently informed us that on January 15th 2015 the Scapêche roundnose grenadier, black scabbardfish and blue ling deep-sea fishery entered in full assessment in order to obtain the Marine Stewardship Council certification. We hereby wish to react upon this announcement and confirm our will to be included in the stakeholder consultation process.

Protecting the vulnerable deep-sea habitats and organisms is a matter of urgency, and it is BLOOM's top priority since its inception. BLOOM has indeed been involved in the production of independent research on this topic for the past ten years and with scientific studies demonstrating the clear unsustainability of deep-sea bottom trawling. In parallel, BLOOM has been engaging with decision-makers in France, the EU and at international level, reporting on the dramatic impact of deep-sea bottom trawling on deep-sea habitats and species and trying to influence fisheries policies.

As it stands, BLOOM's website ([www.bloomassociation.org](http://www.bloomassociation.org)) is one of the most comprehensive sources of information that exists about deep-sea bottom trawling. It thoroughly reflects upon ten years of efforts and actions **against what has been consistently described as a devastating fishing technique**. Our website also gives understanding of the extent of BLOOM's sustained mobilization to denounce Scapêche's deep-sea fishing activities.

During the evaluation process of **Scapêche's roundnose grenadier, black scabbardfish and blue ling deep-sea fisheries**, BLOOM will bring to the assessment body's knowledge the overwhelming amount of reports and scientific articles that should have sufficed from the get-go to prove the unsustainability and destructive nature of such fisheries and ensured that they did not access the MSC's evaluation process.

**In this regard, BLOOM thoroughly questions the robustness of the MSC's standards for them to allow these controversial high-impact fisheries to even be able to access an MSC full assessment.**

To start, the certification body should take note of the **lack of data** concerning deep-sea species. This lack of data has been repeatedly acknowledged several entities, including scientific bodies. Recent examples include:

- The **Scientific, Technical and Economic Committee for Fisheries (STECF) of the European Commission**, which stated in its latest report (2014) that: "*VMS data are not readily available for most fleets*" and that "*in many cases, information on stock structure of deep-water species is lacking. (...) Assessment data are improving for several stocks/species (...) But for the majority of deep water species there is still no conclusive information on stock structure.*" (p. 357)<sup>1</sup>
- The **European Commission itself**, which wrote in a proposal for a regulation of deep-sea fisheries (2012) that: "*Biological data from scientific surveys will probably remain insufficient to allow for full analytical stock assessments in the coming years. The Commission is exploring ways to improve the system of scientific surveys and data collection with regard to deep-sea species for the next programming period. For the time being, the management concept aiming at maximum sustainable yield (MSY) can not be applied to deep-sea stocks due to*

<sup>1</sup> [http://stecf.jrc.ec.europa.eu/documents/43805/801673/2014-07\\_STECF+14-11+-+Review+of+Scientific+advice+for+2015-p2\\_JRC91541.pdf](http://stecf.jrc.ec.europa.eu/documents/43805/801673/2014-07_STECF+14-11+-+Review+of+Scientific+advice+for+2015-p2_JRC91541.pdf)



*shortage of information*<sup>2</sup>

- The European Commission repeats this view in a proposal for a council regulation (2012): "available information on the deep-sea stocks covered by this proposal does not allow scientists to fully assess the stock status, neither in terms of population size nor fishing mortality. There are several reasons for this: these species are often very long-lived and slow-growing, making it extremely difficult to structure the stock into age classes and to assess the effect of fishing on the stock through changes in the length or age structure of catches. The frequency of recruitment of young fish to the stocks is not known. The stocks are widely distributed in depths that are difficult to examine for practical reasons. Data from scientific surveys are often not available due to the reduced commercial importance of these stocks, or do not cover the whole distribution area. Fishing activities are only partly focusing on these species and some have a relatively short history"<sup>3</sup>
- The **International Council for the Exploration of the Sea (ICES)**, which lists blue scabbardfish, blue ling and roundnose grenadier among those for whom special methods of stock assessment need to be developed because they are "data limited" (WKLIFE II, 2012)<sup>4</sup>.

It is noteworthy to recall that **in spite of the lack of data, the EU Council of Fisheries Ministers recently adopted quotas higher than scientific recommendations for French fleets involved in deep-sea fishing**<sup>5</sup>, a decision clearly linked with important lobbying from the fishing industry, which has been thoroughly denounced by BLOOM<sup>6,7</sup>.

As a reminder, the penultimate quota negotiation led in November 2012 to a spectacular increase (+70%) of quota levels for some of the deep-sea stocks. This increase was contradictory to scientific commonsense but understandable in light of the maneuvering by French State scientists, who successfully managed to obtain the classification of deep-sea species in an optimistic category of "well-known" stocks during the data-poor approach ICES workshop WKLIFE. See BLOOM's note on this<sup>8</sup> and on the presence of an industry scientist from Scapêche<sup>9</sup> within STECF, the advisory body to the European Commission.

Another issue concerns the **presence of endangered species in the bycatch** associated with deep-sea fisheries. In 2014, a report by IFREMER<sup>10</sup>, analyzed by BLOOM<sup>11</sup>, revealed that among the 13 shark species for which catch data are available, 11 have an "endangered" IUCN status, meaning that 85% of deepwater sharks caught by Scapêche are endangered species. This information is particularly worrying given that the stock status of deep-sea sharks is particularly difficult to evaluate, ICES reported in 2012<sup>12</sup>.

Moreover, in collaboration with scientists, BLOOM has compiled an extensive literature review on **the impact of deep-sea bottom trawls on the seabed**<sup>13</sup>. BLOOM has thus found that over 70 peer-reviewed publications had documented the impact of deep-sea bottom trawls on habitats, organisms and community structures; and a further 32 publications had established the unsustainability of deep-sea bottom trawl fisheries.

<sup>2</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52012PC0371&from=EN>

<sup>3</sup> [http://ec.europa.eu/fisheries/cfp/fishing\\_rules/tacs/info/com\\_2012\\_579\\_en.pdf](http://ec.europa.eu/fisheries/cfp/fishing_rules/tacs/info/com_2012_579_en.pdf)

<sup>4</sup> [http://www.ices.dk/sites/pub/Publication Reports/Expert Group Report/acom/2012/WKLIFE/wklife2\\_2012.pdf](http://www.ices.dk/sites/pub/Publication%20Reports/Expert%20Group%20Report/acom/2012/WKLIFE/wklife2_2012.pdf)

<sup>5</sup> [http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/agricult/145711.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/agricult/145711.pdf)

<sup>6</sup> <http://www.bloomassociation.org/en/blooms-position-on-deep-sea-quotas-for-20152016/>

<sup>7</sup> <http://www.bloomassociation.org/en/european-fisheries-ministers-must-not-repeat-past-mistakes-for-deep-sea-fish-quotas/>

<sup>8</sup> <http://www.bloomassociation.org/en/why-did-quotas-for-certain-deep-sea-species-dramatically-increase-in-november-2012/>

<sup>9</sup> [http://www.bloomassociation.org/en/wp-content/uploads/2012/11/2012\\_Release-BLOOM-28-nov\\_Eng.pdf](http://www.bloomassociation.org/en/wp-content/uploads/2012/11/2012_Release-BLOOM-28-nov_Eng.pdf)

<sup>10</sup> <http://archimer.ifremer.fr/doc/00198/30936/29313.pdf>

<sup>11</sup> [http://www.bloomassociation.org/en/wp-content/uploads/2014/07/Note-decryptage-des-avis-Ifremer\\_ONG-8-juillet-2014.pdf](http://www.bloomassociation.org/en/wp-content/uploads/2014/07/Note-decryptage-des-avis-Ifremer_ONG-8-juillet-2014.pdf)

<sup>12</sup> [http://www.ices.dk/sites/pub/Publication Reports/ICES Advice/2012/ICES ADVICE 2012 BOOK 1.pdf - search=deepwater shark neafc 2012](http://www.ices.dk/sites/pub/Publication%20Reports/ICES%20Advice/2012/ICES_ADVICE_2012_BOOK_1.pdf-search=deepwater%20shark%20neafc%202012)

<sup>13</sup> [http://bloomassociation.org/download/Bibliographie\\_sur\\_les\\_impacts\\_des\\_chaluts\\_profonds.pdf](http://bloomassociation.org/download/Bibliographie_sur_les_impacts_des_chaluts_profonds.pdf)

The certification body may also want to take into account the **“call for the elimination of deep-sea bottom trawling and gillnetting”** signed by over 300 international scientists.<sup>14</sup>

In anticipation of “counter-arguments” that will spring during the evaluation process, the certification body can also already find a rebuttal **to the typical claims of sustainability and low impact of deep-sea bottom trawling made by fishing industry lobbyists.**<sup>15,16,17</sup>

On top of clearly detrimental impacts on fragile ecosystems, BLOOM's analysis of the audited accounts of the three main industrial French deep-sea fishing fleets has highlighted that they **were chronically unprofitable and that they would not exist and would not be able to operate without substantial public subsidies and the support of a retail network.**

These results were presented at a hearing on deep-sea fishing at the European Parliament<sup>18</sup>. Claire Nouvian then predicted that Dhellemmes (one of the three main French deep-sea operators) would go bankrupt any time soon after precisely because of the unviable nature of its deep-sea bottom trawl activities, and it did.

In light of the few above-mentioned elements, we view Scapêche's request to enter the MSC's full evaluation process as a **mere political maneuver** and yet another **scientific fraud in this deep-sea bottom trawl fishing file**. During the lengthy evaluation process, Scapêche's deep-sea bottom trawl fishery will benefit from several months of positive credit in the public opinion and in the opinion of decision makers. This assessment farce should have not occurred in the first place, especially at **a crucial moment where the deep-sea regulation reform is still being debated at the Council of European Fisheries Ministers. We deeply regret that the certification body and the MSC are the accomplices of such a blatantly grotesque political move.**

Given the wide evidence briefly aforementioned, **we cannot imagine that the unsustainability of these fisheries has not already been acknowledged during the pre-certification process.**

**Therefore, the fact that the pre-certification's conclusion has not prevented Scapêche from entering the full assessment raises many questions about the MSC's certification scheme, which we will take the opportunity to come back to widely and in details.** In our mind it is going to be a complete waste of our time, money and energy to have to debunk the mythical sustainability of deep-sea bottom trawl fisheries when this has already been widely established in peer-reviewed scientific literature. **While we understand Scapêche's motives to greenwash their indefensible deep-sea fisheries, we fundamentally question the robustness of the MSC's standards, its pre-assessment criteria and the transparency of its internal rules and processes.**

**We therefore demand i) access to the pre-certification results, and ii) to be included in the consultation process as a stakeholder. Given the impact that this unexpected and highly improbable evaluation scheme will have on our operational budget and workload, we expect full cooperation and transparency regarding our first request (access to the full results of the pre-assessment) and will not view a refusal motivated by some procedural justification as a satisfactory answer.**

<sup>14</sup> <http://www.bloomassociation.org/en/declaration-of-support-over-300-scientists-call-for-elimination-of-deep-sea-bottom-trawling-and-gillnetting/>

<sup>15</sup> <http://www.bloomassociation.org/en/defending-the-indefensible-how-politicians-and-their-lobbyists-are-doing-it/>

<sup>16</sup> <http://www.bloomassociation.org/reponse-de-bloom-a-lentreprise-de-denigrement-des-lobbies/>

<sup>17</sup> <http://www.savethehighseas.org/news/view.cfm?ID=425>

<sup>18</sup> <https://www.youtube.com/watch?v=x-yt-ts=1422411861&x-yt-cl=84924572&v=t1HbXWhrldc>

