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January 12, 2015

Macarena García Silva  
**BUREAU VERITAS CERTIFICATION**  
Le Guillaumet  
60 avenue du Général de Gaulle  
92046 PARIS LA DEFENSE Cedex – FRANCE

**Re: WWF Finland's comments on NKF Bothnian Bay vendace trawl PUBLIC COMMENT DRAFT REPORT**

Dear Ms. Garcia Silva,

WWF Finland and the WWF International Smart Fishing Initiative appreciate the opportunity to submit comments on the Public Comment Draft Report (PCDR) for the NKF Bothnian Bay vendace trawl fishery to Bureau Veritas Certification. WWF is participating as an active stakeholder in the MSC assessment process for the NKF Bothnian Bay vendace trawl fishery and we wish to present detailed documentation on improvements that we believe are necessary for the fishery to fully meet the MSC requirements for a fully sustainable fishery. In the opinion of WWF, the PCDR has left important issues unaddressed or unresolved concerning retained catch of whitefish under MSC Principle 2 which we discuss in detail below.

We have structured our comments in the format provided within the MSC Fisheries Assessment Methodology (FAM), directly addressing the Performance Indicator (PI) for each component of concern in accordance with the Scoring Guideposts (SG).

Please feel free to contact us if you have any questions.

Respectfully,

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## Retained Species

### 2.1.1 Outcome Status

*PI: The fishery does not pose a risk of serious or irreversible harm to the retained species and does not hinder recovery of depleted retained species.*

The PCDR does not provide sufficiently detailed information on the risk to whitefish populations in relation to the NKF Bothnian Bay vendace trawl fishery. As noted by Peer Reviewer 2, the taxonomic classification used in the PCDR is unclear and inconsistent and needs to be clarified. Whitefish are categorized as a group comprised of multiple populations, forms or species with unclear taxonomy. Generally, whitefish in the Baltic Sea can be divided into anadromously migrating whitefish stocks and more local sea-spawning whitefish. Stated complexes include species and/or populations previously recorded under the scientific names *Coregonus balticus*, *C. maraena*, *C. oxyrinchus* (Baltic stocks, if *C. oxyrinchus* was not restricted to River Rhine), *C. lavaretus* and *C. pallasii*. The species and/or populations in this complex are distributed throughout the coastal waters of the HELCOM area, including adjacent rivers and streams.<sup>1</sup>

It is imperative that the status of the migratory whitefish (*Coregonus lavaretus* L. / *C. maraena*) stocks in the Finnish side of the Bothnian Bay are also taken into account in the assessment of the NKF Bothnian Bay vendace trawl fishery, since the trawling area under consideration is located in very close proximity to the Finnish border and Tornionjoki river, which serves as the main spawning area for indigenous migratory whitefish in Finland. Migratory whitefish are presently listed as endangered (EN) in Finland.<sup>2</sup> They are furthermore listed endangered (EN) in the HELCOM Red List of Baltic Sea species in danger of becoming extinct.<sup>1</sup> The sea-spawning form of whitefish is listed vulnerable (VU) in Finland.<sup>2</sup> Although the Finnish Game and Fisheries Research Institute (FGFRI) currently estimates that the sea-spawning whitefish stocks are strong in the Bothnian Bay<sup>3</sup>, the stocks in the southern parts of the Gulf of Bothnia currently face problems caused by increased sedimentation and occasional iceless winters.<sup>4</sup>

Based on the scoring guideposts for this PI, WWF does not believe that the partial strategy in place for the fishery can be expected to maintain whitefish stocks at a level that is *highly likely* to be within

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<sup>1</sup> HELCOM (2013). Species Information Sheet, *Coregonus maraena*. HELCOM Red List Fish and Lamprey Species Expert Group 2013. Available at << <http://helcom.fi/Red%20List%20Species%20Information%20Sheet/HELCOM%20Red%20List%20Coregonus%20marana.pdf> >>

<sup>2</sup> Urho, L., Pennanen, J. T. & Koljonen, M.-L. (2010). Kalat Fish, Pisces. In Rassi, P., Hyvärinen, E., Juslén, A. & Mannerkoski, I. (eds.). Suomen lajien uhanalaisuus – Punainen kirja 2010. Ministry of the Environment & Finnish Environment Institute, Helsinki. P. 336–343.

<sup>3</sup> Finnish Game and Fisheries Research Institute (2014). Perämeren karisiikakannat ovat vahvoja, vaellussiian tila huolestuttava. Finnish Game and Fisheries Research Institute press release, last edited 12.11.2014. Available at << [http://www.rktl.fi/uutiset/perameren\\_karisiikakannat\\_vahvoja.html](http://www.rktl.fi/uutiset/perameren_karisiikakannat_vahvoja.html) >>

<sup>4</sup> Hudd, R., Hasselborg, T., Huuskonen, H., Jokikokko, E. & Veneranta, L. (2013). Proportion of natural reproduction in the whitefish stocks of Finnish and Swedish coastal rivers and environmental requirements for spawning and larval habitats. Whitefish Workshop 26.- 27.11.2013. Available at << [http://www.rktl.fi/www/uploads/pdf/whitefish\\_ws\\_2013\\_wg2\\_notes\\_edit1.pdf](http://www.rktl.fi/www/uploads/pdf/whitefish_ws_2013_wg2_notes_edit1.pdf) >>

biologically based limits as required at the SG80 level. In the scoring comments section of the PCDR (p. 62) for PI 2.1.1(a) it states that “the stock is likely to be approaching biological limits” and in the narrative section it states that whitefish may already be outside safe biological limits (p. 23). Thus, the first scoring guidepost (a) for PI 2.1.1 is only met at the SG60 level and should be rescored to no higher than 70 pending a more accurate information is available on the status of individual whitefish stocks in the Bothnian Bay that accounts for differences between sea-spawning and migratory whitefish populations.

The third scoring issue for PI 2.1.1 requires that a partial strategy of demonstrably effective management measures be in place such that the fishery does not hinder recovery and rebuilding. Given the current high numbers of juvenile whitefish bycatch and the lack of stock specific information on the status of sea-spawning and migratory whitefish populations WWF does not consider that the measures in place can be considered a partial strategy that can be shown to be demonstrably effective. We strongly recommend that third scoring guidepost (c) should be rescored at no higher than 70.

In summary, WWF strongly recommends that PI 2.1.1 be rescored at no higher than 70 and that a condition be set requiring careful monitoring of the status of whitefish catch in relation to population trends. It is crucial to understand the effects of vendace trawling on whitefish populations especially if the status of whitefish declines. In the case of such a scenario, fishing effort in vendace trawling must be adjusted using the collected catch data to meet the conservation needs of whitefish stocks.

## **2.1.2 Management Strategy**

*PI: There is a strategy in place for managing retained species that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to retained species.*

Whitefish is an important species, both for recreational as well as commercial fishery in the Baltic Sea. In Finland the commercial whitefish catch has decreased since 1990, despite the fact that some 7–10 million fingerlings and 40–60 million larvae are stocked into the Gulf of Bothnia yearly. Additionally the data from Tornionjoki river catches reveal that both the amount and mean size of returning spawners have declined since 1980. River catches of migratory whitefish in river Tornionjoki have been reported exhaustively as a result of historical reasons and fishing rights. In 2009 migratory whitefish catches from Kukkolankoski fishing site was noted as the second worst during the reporting period which began in the 1940's.<sup>5</sup> In recent years the decline of mean size and total catch appear to have stabilized at low levels.

Currently, there is not a strategy in place for managing bycatch that is designed to ensure the fishery does not pose a risk of serious or irreversible harm to whitefish populations. The existing management measures can at best be considered a partial strategy to manage retained catch as they are not designed

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<sup>5</sup> Finnish Game and Fisheries Research Institute (2011). Tulostavoiteraportti maa- ja metsätalousministeriölle. Kalakantojen tila vuonna 2010 sekä ennuste vuosille 2011 ja 2012, Silakka, kilohaili, turska, lohi, siika, kuha ja ahven. Riista- ja kalatalouden tutkimuslaitos 29.6.2011. Available at << [http://www.rktl.fi/www/uploads/pdf/Kala/tulostavoiteraportti\\_2011\\_kalakantojen\\_tila.pdf](http://www.rktl.fi/www/uploads/pdf/Kala/tulostavoiteraportti_2011_kalakantojen_tila.pdf) >>

to consider this retained species component specifically and do not adequately consider stock differentiation among whitefish populations in a manner that will ensure the fishery does not pose a risk of serious or irreversible harm to retained species populations (see MSC Certification Requirements version 1.3 GCB 3.3). Therefore, we believe that the current management measures remain substantially insufficient to address bycatch of whitefish species and do not constitute a partial or full strategy.

For these reasons we recommend a score for this PI of no more than 80 based on the scoring guideposts.

### **2.1.3 Information / Monitoring**

*PI: Information on the nature and extent of retained species is adequate to determine the risk posed by the fishery and the effectiveness of the strategy to manage retained species.*

WWF recommends that the scoring guideposts under PI 2.1.3 be carefully evaluated and rescored based on information presented regarding retained catch of whitefish. Under the first scoring guidepost (a), the fishery does not appear to meet SG100 guidepost as there is not information available on the consequences of whitefish catch for affected populations and should be rescored at 80. Under the second scoring guidepost the PCDR clearly establishes the fact that information is not sufficient to estimate the outcome status with respect to biologically based limits in regards to whitefish and as a result his SG should score no higher than 70. Finally, under the fourth scoring guidepost (d) it is unclear that the current monitoring scheme will detect increased risk to endangered whitefish populations.

WWF recommends that PI 2.1.3 be rescored to less than 80 and that a condition be set that for this PI that highlights the need for further examination regarding the effects of vendace trawling on endangered whitefish populations. Monitoring the amount of by-caught whitefish should be carried out together with research regarding origin, age distribution and composition (migratory vs. sea-spawning) of whitefish by-catch. It is crucial to understand the effects of vendace trawling on whitefish populations especially if the status of whitefish were to decline. In the case of such a scenario, fishing effort in vendace trawling must be adjusted using the collected catch data to meet the conservation needs of whitefish stocks.