



NAPA Policy FIP for the MarinTrust Fisheries Improver Programme – NE Atlantic Blue whiting

Fisheries Action Plan

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Prepared by



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About the North Atlantic Pelagic Advisory Group

The North Atlantic Pelagic Advocacy Group is a market-led approach to improve North Atlantic pelagic¹ fisheries management. Partners are retailers, food service companies and suppliers working together to secure an agreement on total allowable catches for these fisheries in line with scientific advice, and for a long-term science-based management agreement.

NAPA Participants & Stakeholders

The following are project participants, as of January 2021 (feed manufacturer, fishmeal producer):

- Seafish
- NAPA partners:

Ahold DelHaize	Friesenkron	New England Seafood
Aldi North Group	Hilton Seafood UK	Northeast Nutrition Ltd.
Aldi South Group	Havsbrún P/F	Princes Ltd
Appel Fine Foods	Hofseth	Saeby
Aquascot Ltd	Holtermann	Sainsbury's Plc
ASDA Stores Ltd	Interfish Ltd.	Scottish Sea Farms
Biomar	International Fish Cannery	Skretting
Cargill	Karavela	Tesco Plc
Co-operative Group Ltd	Labeyrie Fine Foods (Lyons)	Thai Union
Dawnfresh	LDH (La Doria) Ltd	TripleNine
Karmsund Protein AS	Marks and Spencer Plc	Waitrose Ltd
EU Fishmeal	Morrisons Plc	Young's Seafood
Flatfish Ltd	Mowi	Groupe Gendreau
JCCU		

¹ Northeast Atlantic mackerel (*Scomber scombrus*), Norwegian Spring Spawning (Atlanto-scandian) herring (*Clupea harengus*), and Northeast Atlantic blue whiting (*Micromesistius poutassou*).

Additional stakeholders, who are not formal FIP participants, include:

- Sustainable Seafood Coalition
- Provision Trade Federation
- British Retail Consortium
- Eurocommerce
- Catching sector client groups

About the Blue whiting marine ingredients fishery

History

The blue whiting fishery in the North-East Atlantic has engaged with third-party recognition programmes – primarily MarinTrust (formerly IFFO RS) and the MSC – for over a decade. In 2010, components of the fishery achieved IFFO RS recognition as a responsible source of raw materials for IFFO RS certified factories. Over time a series of assessments and approvals for different components of the fishery were carried out, until landings by Iceland, Denmark (including the Faroe Islands), the UK, Ireland and Norway were all IFFO RS approved.

Prior to the 2010 approval, the fishery had experienced several years in which TAC and catches exceeded the ICES advice – sometimes by more than 50%. IFFO RS approval was given within the context of an international management plan intended to ensure catches remained within the advice². In 2014 there was a failure to reach an international agreement on quota shares, and the resulting TAC (and thereafter catch) was around 25% higher than the ICES advice. Continuing IFFO RS approval was made explicitly dependent on achieving total international catches within the level advised by ICES³.

In 2015 the IFFO RS surveillance assessment noted that the condition placed on the fishery had still not been met, and in early 2016 the fishery was suspended from IFFO RS recognition⁴. However, at the same time as the IFFO RS suspension a large component of the fishery was awarded MSC certification. Although the MSC certification was accompanied by a similar condition to that which had led to the IFFO RS suspension, the IFFO RS policy of recognising MSC-certified fisheries as a responsible source of raw materials effectively nullified the original suspension. Through this loophole the fishery continued to be used as a source of raw materials in the manufacture of IFFO RS certified fishmeal and fish oil.

Between 2016 and 2020, several further Units of Certification (UoC) within the blue whiting fishery achieved MSC recognition with similar conditions. On January 8th 2020, the three CABs involved in the MSC certifications produced a document harmonising the surveillance and re-assessment timelines for the various UoCs⁵. This document set a deadline of November 30th 2020 for the entire fishery to

² Agreement on international management of Blue whiting in the NE Atlantic, October 2011:

https://www.regjeringen.no/globalassets/upload/fkd/vedlegg/kvoteavtaler/2012/kolmule/blue_whiting_2011.pdf

³ See, for example, the IFFO RS Faroe Islands blue whiting fishery assessment, May 2014.

⁴ Blue whiting outcome statement, IFFO RS, 20 March 2016

⁵ Undercurrent News, “With mackerel already gone, Atlantic herring faces MSC certificate loss”, 7 February 2020: <https://www.undercurrentnews.com/2020/02/07/with-mackerel-already-gone-atlantic-herring-faces-msc-certificate-loss/>

resolve the issues which resulted in the conditions – primarily, to reach an agreement on the total international catch.

As of the November deadline, the CABs were not satisfied that the conditions had been resolved, and the blue whiting MSC certifications were suspended with an effective date of the 30th December 2020⁶.

The suspended MSC Units of Certification are:

- SPSP, DPPO, PFA, KFO & CDPSM – certified February 2016
- FPO – certified June 2016
- ISF – certified January 2018
- Norway, Norges Fiskarlag – certified July 2020

FIP scope

Name of the fishery	Blue whiting marine ingredients (reduction)
Commodity group	Pelagic
Species common name	Blue whiting
Species scientific name	<i>Micromesistius poutassou</i>
The target stock(s)	Northeast Atlantic blue whiting
The fishing method or gear type(s) and/or practice	Pelagic Trawl & some Purse Seine
The fishing fleet or group of vessels, or individuals fishing operators pursuing that stock	ISF Iceland North East Atlantic blue whiting Norway North East Atlantic blue whiting Faroese Pelagic Organization North East Atlantic blue whiting
Country	UK, EU, Norway, Faroes, Iceland
Continent	Europe
FAO major fishing areas	FAO27

IP claim management

⁶ MSC press release, “Atlanto-Scandian herring and blue whiting fisheries to be suspended”, 1 December 2020: <https://www.msc.org/media-centre/press-releases/AS-herring-blue-whiting-suspension>

A site **MUST** be listed as a stakeholder in a MarinTrust IP accepted FIP in order to make a MarinTrust IP claim, and also be listed on the MarinTrust Improver Programme Accepted Sites page. In order for a FIP to maintain acceptance on the programme, at least one production site **MUST** pass a MarinTrust site audit within **12 months** of the FIP being accepted otherwise the FIP will be removed from the programme.

A claim cannot be made unless the production site passes a MarinTrust audit, is an active stakeholder of the FIP and the raw material is covered by the scope of the FIP.

Gap Analysis and Improvement needs

From the fisheries assessment and gap analysis (separate document attached) the fishery fails **A3 – Harvest Strategy**, specifically:

- **A3.2** - Total fishery removals of this species do not regularly exceed the level indicated or stated in the stock assessment. Where a specific quantity of removals is recommended, the actual removals may exceed this by up to 10% ONLY if the stock status is above the limit reference point or proxy.

Overarching FIP Key Performance Indicators

The **advocacy activities for this FIP will be co-ordinated along those planned for the NE Atlantic mackerel and herring FIP**. For the purpose of the Blue whiting FIP, MarinTrust stakeholders in the NAPA membership have agreed the following set-of Key Performance Indicators (KPIs) to measure the success of the advocacy activities of NAPA.

- **KPI 1** – by the end of year 1 there has been a significant reduction in the difference between the combined TAC and scientific advice when compared to the long-term average of 25%
- **KPI 2** – by the end of year 2 the agreed TAC has been brought within 10% deviation of the scientific advice
- **KPI 3** – the agreed TAC is now aligned with the scientific advice

The Fisheries Action Plan

Action	Tasks/ Milestones	Responsible (lead)	Responsible (supporting role)	Starting date	Actual completion date	Evidence of completion	Outcomes
1. Engagement to Ensure Robust Harvest Strategies Adopted and Implemented	Communication to continue with Coastal States representatives to promote delivery of exploitation levels consistent with meeting the requirements of A3.2.	Tomolamola Consulting	NAPA Partners Seafish	Jan 2022	Nov 2024 ⁷	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc.	By the end of the third year, NEAFC shall formally adopt appropriately precautionary harvest control rules for the NEA blue whiting stock that ensures the exploitation rates are reduced as the limit reference point is approached and is expected to keep the stock fluctuating around the target level and robust to the main uncertainties. The selection of harvest control rules shall take into account the main uncertainties.
	During negotiations for TACs and sharing arrangements, arrange meetings with catching sector (“roundtable”) to encourage a management solution.	Tomolamola Consulting	NAPA Partners Seafish	Jan 2022	Aug 2023	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc.	In advance of the 2022 coastal states and NEAFC meetings, the catching sector has been stimulated by NAPA to align on calls to action that align with NAPA priorities. Catching sector influences decision-makers in a synergistic manner to NAPA.
	Lobby all parties in seeking a joint solution within the framework of a long-term management plan highlighting	NAPA Partners	Tomolamola Consulting Seafish	Jan 2022	July 2024	NAPA shall provide documented evidence of all related correspondence	NAPA partners publicly publish clear positions on sourcing NEA blue whiting including consequences of FIP failure.

⁷ May end sooner. But plan is to continue until addressed (within the 3-year timeline).

	market consequences of inaction.					between the market and decision-makers.	
2. Dispute settlement legal framework and consultation processes	NAPA reviews and produces a document summarizing the coastal states' and NEAFC's dispute settlement protocols.	Tomolamola Consulting	Seafish	Jan 2022	June 2022	NAPA shall provide a summary of	<p>By the end of the first year, NAPA will publish a critique of the coastal states' and NEAFC's dispute settlement protocols.</p> <p>Ensure the March 2017 draft "Guidelines for Coastal State Consultations in the North East Atlantic" adopt the following text relating to dispute resolution (NEAFC, 2017; Chapter 9 – Mediation, para 25) <i>If agreement on a Framework Arrangement is not reached, the coastal States should consider engaging a mediator. Any decision on engaging a mediator, including the choice of the person and the terms of reference of his/her role, should be made by consensus.</i></p>
	Lobby a coastal state (i.e. Norway) to initiate negotiations for a mechanism, for cooperation and dispute resolution between the Coastal States which is effective in agreeing an appropriate management mechanism consistent with the management plan.	Tomolamola Consulting	NAPA Partners Seafish	Jan 2022	Aug 2024	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc.	<p>By the end of the second year, NEAFC shall establish the Working Group (or similar) on Allocation Criteria.</p> <p>By the end of the third year, NEAFC shall provide a transparent mechanism for the resolution of legal disputes which is considered to be effective in dealing with most issues and that is appropriate to the context of the fishery.</p>

							By the end of the third year, NEAFC shall impose binding arrangements, rather than guidelines, for contracting parties, that results in an agreement that ensures adherence to the harvest strategy by the parties prosecuting the fishery.
3. Effective decision-making processes	Communication to continue with Coastal States representatives to promote delivery of exploitation levels consistent with meeting the requirements of Principle 1.	Tomolamola Consulting	NAPA Partners Seafish	Jan 2022	Nov 2024 ⁸	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc.	By the end of the third year, coastal states are setting TACs that do not exceed ICES advice. By the end of the third year, unilateral TACs are not being set.
	During negotiations for TACs and sharing arrangements, arrange meetings with catching sector (“roundtable”) to encourage a management solution for 2016.	Tomolamola Consulting	NAPA Partners Seafish	Jan 2022	Aug 2024	NAPA shall provide documented evidence of all related correspondence, analyses, actions, meetings, representations etc.	In advance of the 2022 coastal states meeting, the catching sector has been stimulated by NAPA to align on calls to action that align with NAPA priorities on TACs not exceeding advice. Catching sector influences decision-makers in a synergistic manner to NAPA.
4. Ensure KDE information is collected on vessels supplying MarinTrust factories	By year 3 ensure KDEs for wholefish are – fishing vessel(s), species, catch area and date of landing	Tomolamola Consulting	MarinTrust factories	Jan 2024	June 2024	Evidence that this data is being comprehensively reported by year 3	This will help with MarinTrust programme integrity and protection of IP / certification claims

⁸ May end sooner. But plan is to continue until addressed (within the 3-year timeline).

Annex 1 - Milestone reporting template

MarinTrust requires that Improver Programme FIPs undergo an initial 6-month surveillance assessment, and then surveillance assessments at Year 1, 2 & 3. Note that these assessments will have to be undertaken by a suitably qualified independent expert.

Following successful completion of the FIP, the fisheries assessment will be required to be updated by the Certification Body, and go to the MarinTrust fisheries peer-review committee for approval.

MarinTrust Fishery Assessment Section		Initial score	Immediate (6 months)	End of Year 1	End of Year 2	End of Year 3	Status notes
Date							
M1.1	Projected						
	Actual						
M1.2	Projected						
	Actual						
M1.3	Projected						
	Actual						
M1.4	Projected						
	Actual						
M1.5	Projected						
	Actual						
M1.6	Projected						
	Actual						
M2.1	Projected						
	Actual						
M2.2	Projected						
	Actual						
M2.3	Projected						

		Actual						
	M2.4	Projected						
		Actual						
A1	A1.1	Projected						
		Actual						
	A1.2	Projected						
		Actual						
	A2.1	Projected						
		Actual						
	A2.2	Projected						
		Actual						
A2	A2.3	Projected						
		Actual						
	A2.4	Projected						
		Actual						
	A2.5	Projected						
		Actual						
	A3.1	Projected						
		Actual						
A3	A3.2	Projected						FAP actions measured against KPIs
		Actual						
	A3.3	Projected						
		Actual						
A4	A4.1	Projected						
		Actual						
F1	F1.1	Projected						
		Actual						

F1.2	Projected						
	Actual						
F1.3	Projected						
	Actual						
F2.1	Projected						
	Actual						
F2	Projected						
	Actual						
F2.3	Projected						
	Actual						
F3.1	Projected						
	Actual						
F3	Projected						
	Actual						
F3.2	Projected						
	Actual						
F3.3	Projected						
	Actual						

Annex 2 - Acronyms

ASH	Atlanto-Scandian herring
CAB	Conformity Assessment Bodies
CFP	Common Fisheries Policy
DFG	Denmark (in respect of the Faroe Islands and Greenland)
DPPO	Danish Pelagic Producers Organization
EEZ	Exclusive Economic Zone
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FIP	Fishery Improvement Project
HCR	Harvest Control Rule
ICES	International Council for the Exploration of the Sea
ISF	Iceland Sustainable Fisheries
IPSA	Irish Pelagic Sustainability Association
IPSG	Irish Pelagic Sustainability Group
JNRFC	Joint Norwegian-Russian Fisheries Commission
KFO	Killybegs Fishermen's Organisation
MINSA	Mackerel Industry Northern Sustainability Alliance
MOU	Memorandum of Understanding
MSC	Marine Stewardship Council
MSY	Maximum Sustainable Yield
NAPA	North Atlantic Pelagic Advisory Group
NEA	North East Atlantic
NEAFC	North East Atlantic Fisheries Commission
NFA	Norges Fiskarlag/Norwegian Fishermen's Association
NGO	Non-government Organisation
NIPSG	Northern Ireland Pelagic Sustainability Group
PFA	Pelagic Freezer-trawler Association

PI	Performance Indicator
SG	Scoring Guidepost
SPFPO	Swedish Pelagic Federation Producers Organisation
SPSG	Scottish Pelagic Sustainability Group
SSB	Spawning Stock Biomass
TAC	Total Allowable Catch
UoA	Unit of Assessment
UK	United Kingdom of Great Britain & Northern Ireland
UNCLOS	United Nations Convention on the Law of the Sea