

Coöperatieve Visserij Organisatie (CVO)/ Cooperative Fisheries Organization (CFO)  
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Marine Stewardship Council  
Mr Camiel Derichs  
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The Netherlands

Subject: high costs for MSC certification and the consequences for small fisheries

Emmeloord, 1<sup>st</sup> of August, 2013

Dear Camiel Derichs,

With this letter, we would like to express our concerns about the high costs for MSC certification and the consequences this has for small-scale fisheries.

The Cooperative Fisheries Organization is a cooperation between Dutch Producer Organizations and functions as the client group in several MSC assessments. The CVO and its fishermen appreciate the strong and independent MSC label, but also face major difficulties as a result of the MSC program that we would like to address here.

The Dutch gill net fishery started an MSC assessment in November 2008 and received the MSC certificate for their sole catches in November 2009. During the assessment process stakeholders only had minor comments and no objections were received after final determination. The Dutch gill net fishermen were glad to have the sustainable nature of their fishery confirmed by an independent certification body against an international sustainability standard agreed amongst stakeholders. Fishermen see the MSC certificate as an important asset; often required to retain access to fishing grounds and/or as a license to produce in a growing number of retail stores.

The initial assessment of the Dutch gill net fishery was partly funded by the Dutch government and the World Wildlife Fund. The financial support ended upon receiving the MSC certificate and the Dutch gill net fishermen became responsible for all costs related to the certificate from that date. This included yearly surveillance audits, project management and the costs involved to comply with the MSC conditions. The latter included collecting information on catches and discards; a condition that required expensive research.

The Dutch gill net fishermen all make a modest living from their fishery, sometimes even part-time and supplemented with other jobs. Despite the small-scaled nature of the fishery, the fishermen are faced with ever increasing demands on subjects like vessel safety, crew safety and education. In addition, their fishing activity is limited by the introduction of N2000 management plans, the National Porpoise Conservation Plan and rules and regulations resulting from the new CFP. To voluntarily apply for and maintain a sustainability certificate like the MSC next to all legal requirements, is a difficult and challenging task for a small fishery. Especially when the financial benefits resulting from the use of the MSC label for sole have been only minor or non-existent and could not compensate for the yearly MSC costs. The absence of an economic incentive has increased the financial burden for the MSC participants, which made the number of participants decrease to only 30 in 2013. Unfortunately, this increased the annual costs for these remaining participants even more and leaves the annual fee now already above the maximum of what the gill net fishermen can carry.

In addition to the annual maintenance costs for the MSC certificate, MSC requirements state that every 5 years the fishery needs to be recertified. For the Dutch gill net fishermen, re-certification should start at the end of 2013. Estimated costs for this come close to € 50.000.- ; an amount that can never be paid by 30 mostly part-time gill net fishermen. Inevitably, this will force the Dutch gill net fishermen to leave the MSC certificate in November 2014.

The MSC program should be accessible for all types of fisheries that can comply with the minimum required *sustainability* level, independent of size or nature of the fishery. In the current situation however, the MSC is primarily accessible for fisheries with sufficient financial resources to comply with the MSC requirements. Smaller fisheries like the Dutch gill netters will not be able to stay MSC certified due to financial reasons, while they do meet the sustainability criteria, and that is what MSC is all about. This will put the smaller fisheries at an even bigger disadvantage, because they will not be able to compete in a market that demands certified sustainable products more and more. Having the MSC certification should be a matter of *sustainability*, not a matter of having adequate financial resources.

CVO recognizes the need for a common level of sustainability in the MSC certificate, but questions whether the requirements to measure this sustainability level should be the same for all fisheries. The Dutch gill net fishery is a fishery with a very low rate of change and 2 out of 3 conditions have been closed at the third surveillance audit in 2012 (the third condition is on target). We emphasize that re-assessment after five years is an unnecessary waste of time and resources, only to produce a report that will be almost the same as the first one, with the only difference that they have actually improved in relation to the start of their certificate. In this case, re-assessment would just be a new report that will state the 'known', but will force the fishermen to leave the certificate due to insufficient financial resources. This is unacceptable and requires a direct and significant change.

MSC is currently undertaking a review of the length and costs of the certification process with the ultimate aim of reducing both. However, for the Dutch gill net fishermen these changes will not be in time before their re-assessment. For our gill net fishermen, who have been MSC fishermen for almost four years now, this is a major disappointment in times that are already tough without losing their sustainability certification.

Change is needed now to protect current and future smaller MSC fisheries. We look forward to discussing solutions to our problem with you. It is in the interest of both MSC and of sustainable fisheries like ours that they become and remain certified to show others that they are truly sustainable and work towards healthy oceans. We hope to hear from you soon.

Your sincerely,  
Ing. J.I. Hennekeij



President of the CVO