

Arendal, 31 March 2025

Input to the management of Raet National Park

As a representative of my conservation company [VISION 52](#) in the Advisory Committee for Raet National Park, and as a member of the [IUCN World Commission on Protected Areas \(WCPA\)](#), I would like to provide the following basic input from a conservation point of view to the further development of Raet National Park:

Based on the fact that the National Park Board and the Norwegian Environment Agency will initially prioritise input on **land areas** in the national park, the following basic recommendations are given:

1. For the sake of special cultural monuments and geological structures (especially the ravine that has given the park its name), it is natural that such areas are kept visible. They should therefore be mapped and managed in an appropriate manner.
2. For special, traditionally managed habitats such as coastal heaths, management measures can be recommended, especially if carried out by private landowners themselves. However, these areas, which correspond to the IUCN category of landscape conservation areas, should not cover more than 10-20 kilometres.
% of the land area in the national park, and they should not affect older forest stands.
3. For special areas that are important for the protection of species or species communities that are otherwise rare in Norway (e.g. areas with high diversity in the butterfly fauna or special breeding areas for seabirds), it may be considered whether special species protection measures are appropriate. These areas will correspond to IUCN category VI for nature reserves.
4. In the vast majority of the national park's land area or on the islands and in the archipelago, the free development of natural processes should be prioritised, and

no conservation measures should be introduced. These areas, where nature is allowed to be nature, should representatively cover different habitat types that are typical for the region.

5. It must be ensured that the national park administration's budget and labour are not tied up in long-term and large-scale maintenance measures. In the national park, nature should be able to develop as undisturbed as possible by human intervention.

Although no input is currently expected on the marine area (98%) of the national park, I would like to take this opportunity to draw the attention of the national park management, and in particular the National Park Board, to the following great opportunities to make Raet National Park the first "true" (IUCN criteria) national park on mainland Norway:

Only two major development measures are required, and there are good reasons why they are easier to implement in Raet National Park than in other areas in Norway:

A) End all hunting in the entire national park.

Many countries around the world have experienced the so-called the "national park effect", which means that the animals lose their fear of humans when the hunt is over, thereby expanding their habitat and becoming an accessible attraction for visitors. Over the years, I've been able to study this myself in the Wadden Sea and demonstrate it to others using harbour seals and brent geese.

Danish ornithologist Hans Meltøfte has analysed thousands of data from around the world on the flight distance of waterfowl from humans and boats in areas where waterfowl are hunted, compared to hunting-free areas. The result of his study:

The flight distance of huntable waterfowl populations is 10-12 times greater than that of non-huntable populations in regions with little or no hunting. Measured in square metres, the area without waterfowl in

hunnable populations a factor of 100 greater than in non-hunnable parts of the world.

As you can see from historical photographs, waterfowl hunting probably played a major role in earlier times in the area that is now Raet National Park. A large number of hunted auks and guillemots indicate that these birds were far more numerous in earlier times than today. Today, there are obviously only a few hunters who are still active in the national park, and hunting can no longer be considered an economic or other important factor for the region. It should therefore not be politically difficult to persuade these few hunters to pursue their interest only outside the national park.

Not only birdwatchers and photographers would be rewarded, but also all other visitors to the national park. They would be far less of a disturbing factor themselves, but would be able to experience much richer wildlife at a shorter distance. At the same time, the animals would have an area up to 100 times larger at their disposal, which they could use and live in.

B) Introduction of "No-take Zones" in more than half of the national park.

The underwater world is by far the most important and valuable part of Raet National Park, and can be seen in the report 2024-38 from the Norwegian Institute of Marine Research. Therefore, this area deserves much more attention. Protection and research should go hand in hand here. Much about the diversity of life is yet to be discovered. The devastating effect of large-scale removal of marine animals and physical damage to the seabed through bottom trawling can only be imagined.

The fact that even the Ministry of Fisheries has introduced a ban on fishing for cod, which has drastically declined in local stocks, shows that the instrument of (at least temporary) conservation is also being used here to rebuild stocks.

The lobster reserve established for research purposes in the Flødevigen area also shows how fishing can benefit from "no-take zones". The "spillover effect" for local lobster fishermen is impressively demonstrated here.

As marine biologists have been able to show in many examples around the , and as the Institute of Marine Research's report 2024-30 on Raet National Park explains, the introduction of no-fishing zones is likely to have a very positive impact on the diversity of life in the zones and on fishing in the vicinity of the zones.

The most important factor here is that fish and other marine animals are getting older and bigger in no-fishing zones, producing exponentially more offspring with increasing size, and in some cases also more often.

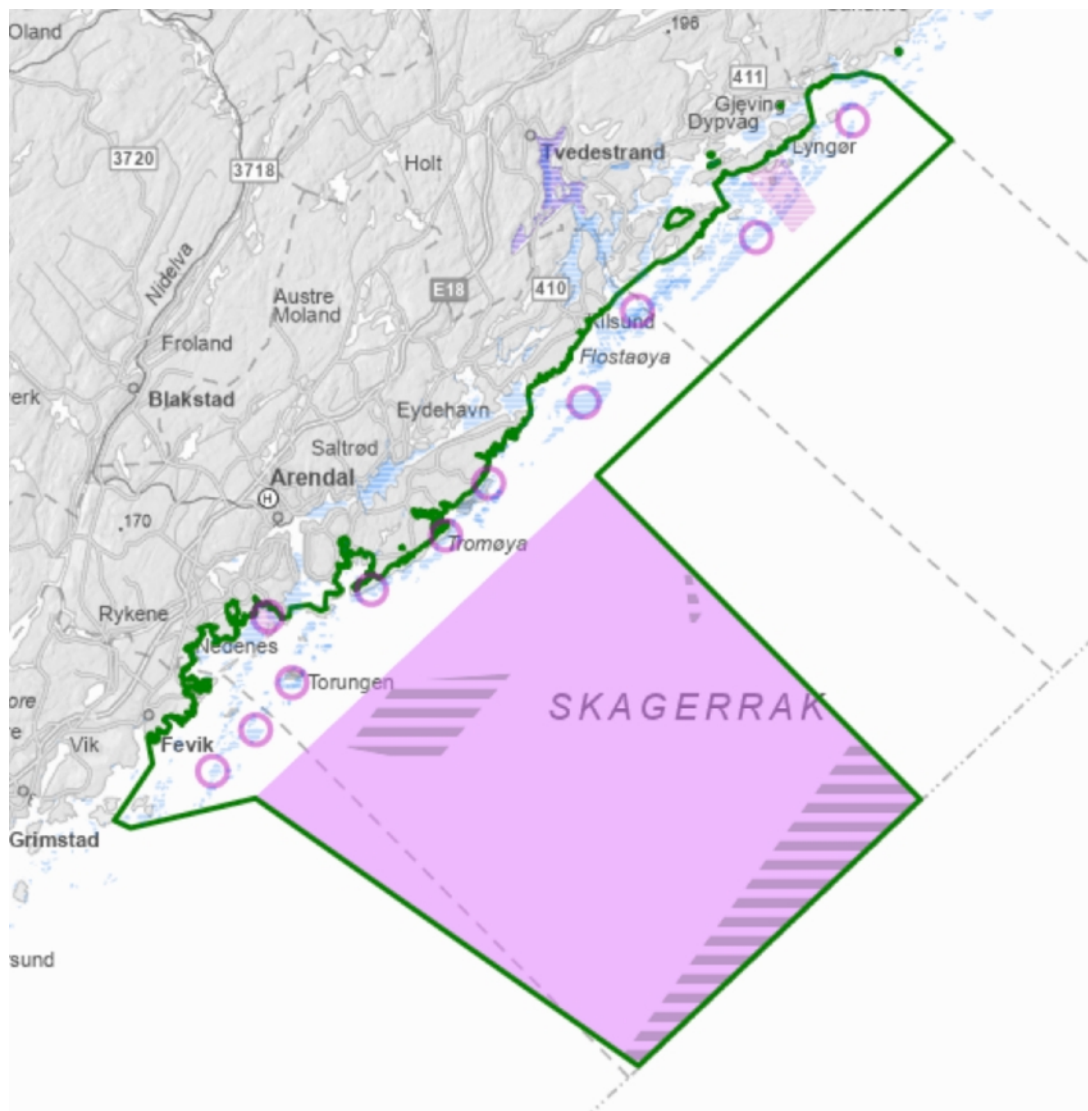
The goal of a "true" national park according to IUCN criteria, potentially Norway's first, can be achieved by not taking or harming animals and other natural elements from at least the majority of the national park.

At the same time, we propose to divide the national park into two areas to keep restrictions on local fishermen and recreational fishing at an acceptable level:

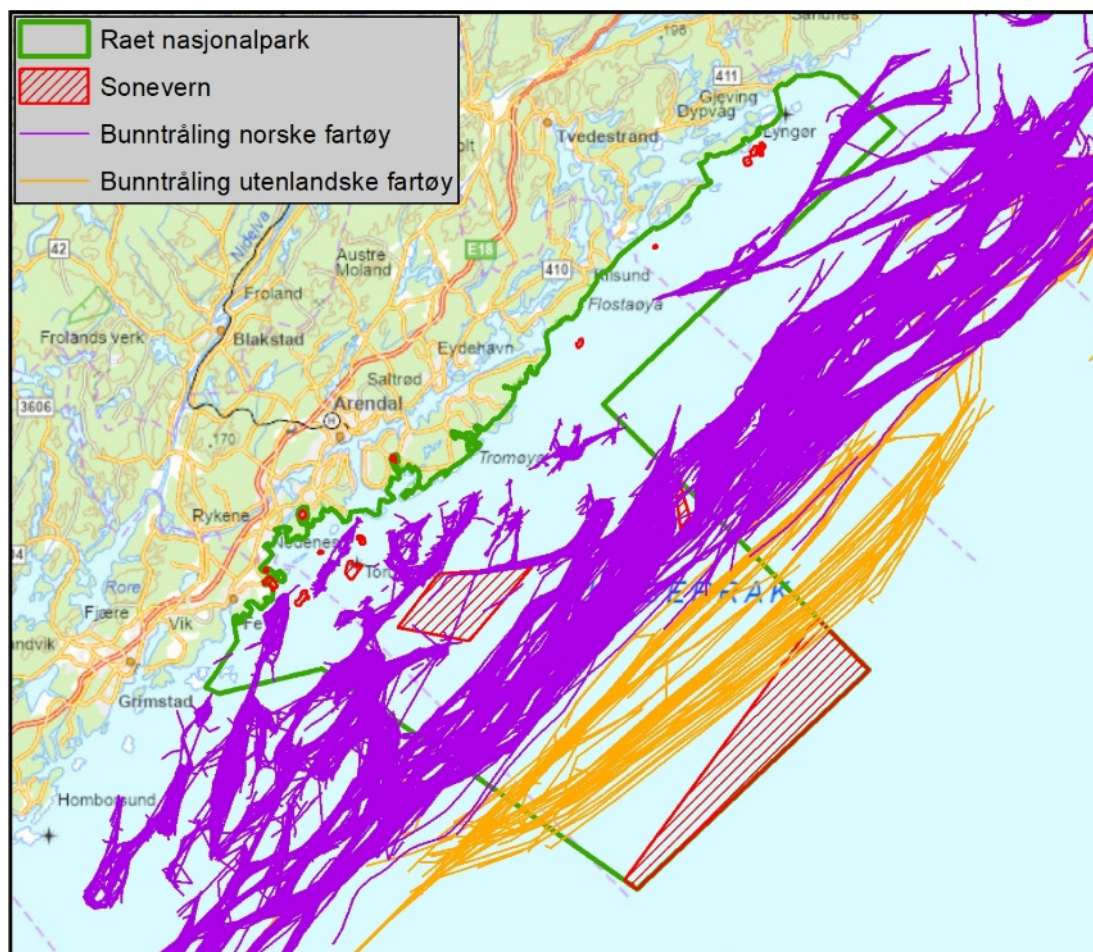
(a) The shelf area on the islands and in the archipelago, which makes up about half of the national park.

Here, criteria for particularly valuable areas should be developed in collaboration with research institutes that can be used to introduce smaller no-fishing zones. In the majority of this inner area of the national park, there is still sufficient space for fishing activities.

(b) **A large, contiguous area that stretches like a transect across different habitats in deeper marine zones.** Here, a basic ban on fishing, primarily bottom trawling, should come into force as soon as possible, and monitoring of the protective effect should be left to marine research institutions right from the start.



Detailed maps of these proposed no-take zones can be found here: <https://kart.asplanviak.no/share/539a58cb551a>



Figur 28. Spordata (VMS) for tråling av norske og utenlandske fiskefartøy (filtrert på hastighet mellom 0,8 og 2,5 knop) i og rundt Raet nasjonalpark for perioden 2019 til august 2024. Kilde: Thomas Køppen/Fiskeridirektoratet.

Fig. 28 above from the Institute of Marine Research's report 2024-38 on Raet National Park shows the areas in which major fishing activities have taken place to date, especially bottom trawling. In the deeper areas there are Danish fishing vessels that are responsible for these activities. The extent to which local fishing companies will be affected by the large protection zone (or later be able to benefit from the ripple effects) must be discussed in detail with them. The introduction of the protection zone does not necessarily mean that fishing vessels will have to make detours to reach their areas of use outside the zone. Passage without fishing should continue to be permitted, just as shipping is not restricted throughout the national park.

A study I have just started shows that there are many impressive examples around the world of how no-fishing zones were initially met with significant resistance from local fishing interests, but that the same fishermen later became supporters because they realised the benefits of fishing around such zones.

I see it as a great opportunity for the three national park municipalities of Grimstad, Arendal and Tvedestrand to set an example for the whole of Norway of a national park that deserves its name and is not just a simple landscape conservation area or "paper park".

Norway has also been particularly active in the UN to achieve the goal set by the CBD in 2022 to effectively protect 30 per cent of the world's land and sea areas by 2030. By using the example of a hunting-free Raet National Park with real and large protected areas, the Norwegian authorities were able to show that they mean business and that by implementing the 30x30 target in a positive way they are also strengthening national park development in other parts of the world instead of weakening it through the absence of real national parks.

I would be delighted if my proposals are positively received and if we can further develop and implement them together with the national park administration, the national park board, the members of the advisory committees, other local stakeholders (especially fishermen) and relevant research institutions.

A handwritten signature in blue ink, appearing to read 'P. Prokosch', is positioned above the contact information.

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