

Consultation input for fisheries measures in the Oslofjord

Sabima and BirdLife Norway are in favour of the government's proposal for fishing measures in the Oslofjord. We support the establishment of all three no-fishing zones, Inner Fjord, Færder National Park and Hvaler National Park, and research shows that strict restrictions and large areas provide the best effect of protection.

We believe that strong marine conservation measures are essential to restore the Oslofjord's ecological functions and ecosystem services. The measures could also make a positive contribution to seabirds and other top predators if they are implemented via an ecosystem-based and holistic approach.

management. To ensure that fisheries measures have the greatest possible positive effect on the ecosystem, it is necessary to

At the same time, efforts must be made to combat other threats and a fishing ban must be implemented for sprat and herring throughout the fjord. We also believe that all marine conservation measures, including fishing measures, must be monitored with clear impact targets that are followed up in an adaptive management plan. It is also important that commercial fishermen receive fair compensation solutions and that the management ensures the participation of those affected in further processes. See the elaboration and justifications for our five main points below:

1. Fisheries measures must be part of holistic and ecosystem-based management

The proposed fisheries measures are essential for restoring the marine ecosystems in the Oslofjord and are used as part of holistic management of the fjord system (from land to underwater). By reducing one of the biggest threats in the Oslofjord, namely fishing pressure, the fishery measures will help to restore fish stocks, which in turn will help to regulate lower trophic levels (top-down effect).

In this context, it is important that fisheries measures are defined as marine conservation measures, cf. the national marine conservation plan (2021), and that their design, implementation and monitoring follow international criteria (IUCN) as part of international reporting on the Nature Agreement (30by30). This means, among other things, that the proposed fisheries measures must have a proven positive effect on entire ecosystems (and not just a single species or group of species), cf. the IUCN Assessment tool¹(see section 4 on monitoring of measures and adaptive management).

¹Dunsha, G., Olausson, K., & Eckbo, N. H. Potential marine Other Effective Area-Based Conservation Measures (OECMs) in Norway: Current compliance status in relation to CBD and IUCN guiding principles, definitions and criteria.

The purpose of the regulations, "*to help rebuild the ecosystem in the Oslofjord*", nevertheless requires increased efforts in other areas if the fishing measures are to have the greatest possible positive ecological effect.

The government must therefore at the same time significantly reduce the two other biggest threats to the Oslofjord: the supply of nutrient salts and land use changes/development of the shore zone, cf. the Action Plan for the Oslofjord. In this way, the fjord's system can be improved from both the top and the bottom of the food web and ensure synergies between various management and conservation measures.

The proposed fisheries measures must also be included as part of marine spatial planning. Marine spatial planning has its historical origins in marine conservation in the Great Barrier Reef (Australia), but since the 1980s it has been diluted to be only about organising human activity to prevent conflict between human interests. This is neither ecosystem-based nor sustainable. In the Oslo fjord, the government now has a unique opportunity to put in place a holistic and ecosystem-based management of the fjord, linking sectoral measures (such as fisheries measures) and cross-sectoral measures (such as improving national parks) with marine spatial planning.

For example, it is important to stop dredging and land reclamation at eelgrass beds, soft-bottom areas and shallow sea areas. For many seabirds and marine mammals in the Oslofjord, boat traffic, landing on islets and disturbances along the shoreline are a significant problem. The impact of these factors must be reduced and fishing-free zones should also have a ban on hunting seabirds and marine mammals. Restoration should also include opportunities to relocate physical interventions such as marinas.

In the same context, we are also critical of the fact that fish is not a quality element in the water regulations for fjords and coastal waters. As a result, the ecological crisis in the Oslofjord is not reflected in Norwegian water management.

Sabima and BirdLife Norway therefore believe that the government's proposed fisheries measures are both necessary and will require increased efforts to stop the supply of nutrient salts through technology and nature-based solutions such as re-establishing riparian zones along watercourses and the like. Targets for land use neutrality must be introduced in municipal and regional land use plans. As part of this, the government must speed up the restoration of beach zones and other important marine functional areas. The fishery-free zones must ensure connectivity and synergies with other protection measures and functional areas in the Oslofjord, along the Skagerrak coast and at sea. In addition, fish must be included as a quality element in the ecological status of fjords and coastal waters.

2. Fisheries and conservation measures must be part of the solutions for seabirds Seabirds are an important health indicator of marine ecosystems because they integrate the entire food web in their responses. Lack of food and availability at the right times and throughout the breeding season is one of the main challenges for seabirds in Norway - including the Oslofjord. The vast majority of seabird species in the Oslofjord are undergoing major population declines. We now have a historically low level of species such as the grey gull and the common tern, the latter of which has had few or no chicks in recent years. Seagulls are struggling to find food, and species such as herring gulls and grey gulls are largely moving to urban breeding grounds due to a lack of marine food. Any increase in food in the fjord will help to reverse this trend.

Seabirds could benefit greatly from the proposed fishery measures, both directly via increased access to fish species and indirectly via cascade effects in the ecosystem as a result of more cod and other fish species. For example, terns are completely dependent on schooling fish for their own survival and to produce young, and will therefore benefit greatly from the proposed fisheries measures.

The government has drawn up an action plan for seabirds. One of the main goals is to improve conditions for seabirds by 2035. This action plan emphasises that access to several important food resources for seabirds in the North Sea and Skagerrak is at a low level. Tobis and young age classes of saithe and cod are mentioned in particular. The plan also emphasises the importance of implementing effective measures quickly, but delivers weak measures and does not mention marine protection as part of the solution.

Sabima and BirdLife Norway believe that the government has an opportunity to fix an otherwise weak seabird action plan by introducing the proposed fishing measures in the Oslofjord. The rapid implementation of conservation measures is absolutely necessary to achieve the action plan's goal of population increase by 2035.

3. Full stop on sprat fishing

Section 9 of the regulations (Prohibition of fishing for herring and sprat) still permits fishing for herring and sprat with boats under 13 metres outside of fishing-free zones. This will dilute the effect of the fishing measures.

"Mobile schooling fish are important for biodiversity, not least as food for seabirds. We believe that this fishing must be stopped in its entirety now, and that more research must be conducted into what constitutes sustainable fishing in the future. When fishing for these species, the ecosystem perspective, the precautionary principle and consideration for endangered biodiversity must be paramount. We refer to the management of sprat in the Trondheim Fjord, where fishing has been stopped for most seasons with some exceptions in particularly good years.

Sabima and BirdLife Norway believe that the government should introduce an immediate fishing ban on sprat and herring in the entire Oslofjord and develop a sustainable fishing quota that also takes into account the nutritional needs of other species in the ecosystem, such as seabirds.

4. Introduce action monitoring and follow-up through adaptive management

To ensure that the fisheries measures have the desired positive effect, an ecosystem-based monitoring programme must be developed for the effects of marine conservation measures in the Oslofjord. This should be anchored as part of the monitoring of measures in the Norwegian Environment Agency. Monitoring measures is about checking that the measures actually have the effects we want, so that we can adjust the measures over time - either by making them more stringent, introducing more measures or cancelling measures.

Monitoring of measures must be based on defined effect goals in a management plan. At present, the purpose of the regulation is not sufficiently clear on what the desired effect is beyond helping to rebuild the ecosystem in the Oslofjord. As part of the follow-up of the fisheries measures, and to ensure synergies with other management and conservation measures, methods and cooperation must be developed for gathering knowledge across professional communities (researchers, professionals and volunteers), management regions (national parks) and existing national monitoring programmes. BirdLife Norway has accumulated a great deal of knowledge and a large amount of data on seabirds in the Oslofjord over time, which will be useful for monitoring effects at higher trophic levels.

A process must also be initiated together with specialised environments and stakeholders to design the desired impact targets. Early involvement will help to ensure that we get the effects we want and that we can gather around a common goal.

Sabima and BirdLife Norway believe that the government must put in place a national monitoring programme for marine conservation measures, and that the Oslofjord provides a unique opportunity to bring together professional communities and stakeholders to develop a common framework, methodology and design, with transfer value to the entire Norwegian coast.

5. Provide fair compensation for commercial fishermen


Fishing is an important part of local value creation in the Oslofjord and along the coast, and we recognise the value of fishermen as part of the population with local knowledge of the state of nature. It is very important to create alliances between different user groups and professional environments so that marine conservation measures are strong enough to have a positive effect on both ecosystems and livelihoods along the coast.

Sabima and BirdLife Norway believe that the government must enter into an active dialogue with fishermen and other affected parties in order to provide fair financial compensation for loss of income, as well as predictability for the future fishing industry. Such a process can also be used to encourage the development of more sustainable fishing methods and a multi-stock quota system that can prevent us from getting similar Oslofjord conditions elsewhere.

Sincerely yours,



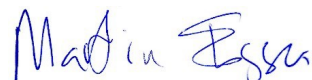
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