

3 April 2014

Dr Paul Crozier  
WWF New Zealand  
PO Box 6237  
Wellington

Dear Paul,

### **WWF-NZ's Submission on MRAG-America's ORH Pre-Assessments**

Thank you for taking the time to submit on MRAG's pre-assessments. We have forwarded your submission to them for their consideration.

You will recall that DWG undertook these further pre-assessments in response to WWF-US's advice. WWF-US informed DWG that they do not support Moody Marine/Intertek, who had previously undertaken a formal pre-assessment of New Zealand orange roughly against the MSC Fisheries Standard. We advised at the time that MPI and DWG have the knowledge of both the MSC Fisheries Standards and of the four orange roughly fisheries to do an 'internal' risk assessment of likely non-conformances of the performances of these four fisheries against the MSC standards.

WWF-US advised this would be unsatisfactory as they would only support a formal pre-assessment by an accredited CAB, one whom WWF-US supported, as a lead in to a formal FIP. They further advised that MRAG-Americas would meet their requirements as an accredited CAB. Accordingly, DWG contracted MRAG to undertake these four new pre-assessments.

We therefore find it curious that WWF-NZ has elected to internally re-score MRAG's determinations in this matter.

In general, when taken against the MSC Fisheries Standard your overall conclusions align with MRAG's findings and we agree with these. We note that remedial actions are already in place to improve the performances for all PIs assessed by MRAG to likely be below the 80SG level, in order that these fisheries will meet the MSC standards. These actions and timelines are summarised in the FIPs.

The MSC Fisheries Standard is the benchmark against which New Zealand fisheries management has chosen to test these fisheries. WWF-NZ's view that some aspects of performance should be measured against alternative 'standards', while a fine position to hold, is one that differs from the objectives of this exercise

We welcome your feedback and remain happy to meet with you at any mutually convenient time to further discuss any of these matters in detail should you wish to do so.

Kind regards



George Clement  
CEO