

# FINAL REPORT (DEVELOPMENT AWARD)

**2012/746.20 Preliminary investigation of internationally recognised Responsible Fisheries Management Certification - Boston**

**AWARD RECIPIENT: Sevaly Sen**

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**DATE:** 30 June 2014

## ACTIVITY UNDERTAKEN

Attended the North American Seafood Show in Boston 15-19 March 2014.(Travel 13-21 March 2014)

## OUTCOMES ACHIEVED TO DATE

- Met with all key people/organisations involved in the GT Responsible Fisheries Management Scheme.
- Attended the GSSI workshop.
- Attended the MSC Update Seminar
- Attended the G.U.L.F presentations

## Background

Developments in third party certification especially with regard to the Responsible Fisheries Management Scheme are changing rapidly. All of the key organisations trialling or undertaking the Scheme were attending the Boston show.

## Need

The Boston Show is an excellent opportunity to discuss experiences/lessons learned with RFM scheme participants. This is of benefit to the RFM Project 2012/746.

## Objectives

Attend the North American Seafood Show to meet with RFM Scheme participants, plan further collaboration and update on GSSI developments.

## Methods

Please see attached report.

## Results/Discussion

Please see attached report.

## Benefits and Adoption

All stakeholders involved in the RFM project 2012/746.

## Appendices

Report of my trip attached.

## APPENDIX 1

### **Report North American Seafood Show, Boston 15- 19 March (travel 13-21 March)**

**Sevaly Sen  
Principal Investigator  
RFM Project  
2012/746.20**

### **General Conclusions**

- Responsibly/sustainably sourced seafood is increasingly “a gimme” like food safety. Many of the expo stands did not highlight their sustainability credentials.
- The trend continues towards B2B only certification or partnering with eNGO to undertake internal sustainability “due diligence” by seafood buyers (tailoring to sourcing policies of company). The high costs of certification is an issue. Some countries, particularly Germany, ecolabels remain important.
- Fisheries improvement plans or equivalent are being seen as a cost effective way to show fisheries are on a path towards gaining third party certification (although may not bother if they gain market access through FIPs). There is likely to be some friction about credibility between FIPs as branded by the Sustainable Fisheries Partnership/MSC. In effect, the debate transfers from the credibility/recognition of certification schemes to FIPs.
- For countries/areas e.g New Zealand, US Gulf, Scotland that have strong management frameworks, origin (with traceability) is continuing to be explored as this may have a higher value in some markets, particularly Asia than sustainability – this also enables scope increase into animal welfare, labour conditions etc.
- There is co talk around some form of externally assessed “health check” for fisheries management frameworks against FAO CRRF particularly for smaller, non-export oriented fisheries unable to afford third party certification but wishing to demonstrate that they are responsibly managed. However there are mixed views: some believing that there would be little traction with seafood retailers/wholesalers; others thinking that it may be sufficient provided a third party audited the process.
- There remains uncertainty around the future of GT-RFM certification continues – Iceland has decided to “go its own way” and use their own RFM specifications. ASMI is awaiting a decision

from their Board in late April. Canada seems to have lost momentum although the Fisheries Council of Canada remains interested, provided there are cost efficiencies and international recognition. Louisiana is moving ahead on the development of the RFM Louisiana ‘standard’ as GT still under contract, but are not convinced that this is the way forward and are exploring other options.

- The GSSI appears to be at a crossroads- there is lack of clarity as to whether it will be a benchmarking tool (yes/no) or a standards rating tool or even a new standard. There was considerable discussion about this at their mini-conference and the results of the deliberations of the Steering Board subsequent to this conference are awaited. There is some discomfort about WWF now being on the Steering Board and ISEAL chairing the Process working group.

## Meetings held

### **Randy Rice and Tricia Sanguinetti, ASMI**

The ASMI Board will meet in late April to decide the way forward with RFM. Some Board Members are reluctant to pursue RFM as they have been offered discounted MSC recertification from Intertek Moody plus the usual logo licencing discounts that MSC offer on third round certification.

The issue of ownership of the Conformance Criteria remains resolved. Currently ASMI are using v1.2 Conformance Criteria; the first time they will use v1.3 is in 2016 when the RFM fisheries are up for recertification. However, v1.3 is still not finalised.

Their opinion is that if there is no market demand for certification then it should be avoided as it is an expensive and long process. For gaining social licence, there may be alternative ways, including possibly FIP- type programmes. The idea of certifying the management framework is interesting but may not get the traction with seafood buyers.

They are concerned about the direction GSSI is going, particularly now that WWF (Dr Jason Clay) is on the Steering Board. The end result might be that schemes, except MSC, will choose not to go through the benchmarking process.

Iceland has decided not to pursue GT RFM certification will use their own RFM specifications and have asked SAI Global/GT to pursue ISO17065 accreditation for their specifications which were developed prior to the RFM criteria.

### **Patrick McGuinness, Fisheries Council of Canada**

A copy of his powerpoint presentation which he took on a road trip across Canada once the RFM feasibility study had been completed was kindly given to me and is attached as Attachment 1.

When Canada decided to undertake the feasibility, both Iceland and Alaska were in full support of RFM and the FCC believed RFM had full market acceptance. RFM was considered to offer considerable efficiencies for more complex multispecies fisheries. Canada added an additional stakeholder input

(which neither Iceland or Alaska had) due to strong eNGO stakeholders (on the West Coast). Stakeholders could schedule a meeting with the team during the site visit as well as a public submission period prior to certification. Neither Alaska nor Iceland had any issues with this addition, although it does increase cost.

During this process, the US Maine lobster industry became MSC Certified. As lobsters are mainly processed in Canada, the Canadian lobster industry, despite their reluctance, decided to get MSC certification as well. There were issues with eNGOs and the BC Pacific Ocean perch fishery, so the RFM program has lost momentum especially as 66% of Canadian production is now MSC certified. Another issue is that some of these fisheries may only get MSC certified once, and that may be enough.

Department of Oceans and Fisheries prefers RFM as it believes it enables them to make decisions about management without feeling blackmailed; FCC believes there are cost savings particularly with regard to the review processes. FCC are still trying to get RFM participating countries to meet to discuss the future options such as a loose knot governance group with each member organisation on a council but Iceland appears to be going its own way. Canada found v.1.2 of the Conformance Criteria repetitive and noted that V.1.3 of the Conformance Criteria went through 3 drafts but still not finalized. Governance needs to be sorted out-the FCC have spoken to SAIGlobal in Toronto but they did not want to get involved.

#### **Christina Burrige, BC Seafood Alliance**

Governance needs to be resolved with RFM program. However, there remains a need for a credible alternative to MSC as MSC is an expensive process (\$700k for salmon). Still thinks that salmon would be a good fishery for RFM certification. A lot of very active eNGOS in BC so have to be more alert than some other areas. Not much change from last year (our discussions in Brussels). With regard to the BC herring fishery and RFM, they decided to go for Monterey Bay assessment as all is sold in California. Would advise only pursuing MSC certification if the customer requires it and for social licence.

#### **Julianna Mullen, John Fallon, Laura Piccariello, and Ashford Rosenberg, Audobon Nature Institute**

Audubon was contracted by Louisiana Dept. of Wildlife, Fisheries and Game to work with GT to undertake RFM certification. They will be the standard owners. GT is currently finalizing their draft standard based on assessments they have undertaken and developing certification requirements.

We discussed progress – slower than anticipated – and the likely outcome. As Audobon are under contract, they have to deliver- but Julianna was uncertain as to whether in the end this will be the approach adopted by the Department for Louisiana fisheries.

Audobon, in association with the Gulf States Fisheries Marine Commission have also just commenced FIP-type plans, called Marine Advancement Plans (MAPs). These are being managed by Laura Piccariello and have only just started. The idea is that the fisheries involved may wish to go for third party certification – but MAPs may be sufficient to gain market access.

Re MAPs, see: <http://audubongulf.org/advancing-our-fisheries/>

**Alex Miller, Staff Economist, Gulf States Marine Fisheries Commission; Katie Semon Louisiana Dept. of Wildlife and Fisheries**

Brief discussion about developments with Finfo and traceability programs in the Gulf States. Alex will be attending IIFET in Brisbane in July this year and chairing a session on traceability.

**Damon Morris. Louisiana Dept. of Wildlife and Fisheries**

I have been having ongoing discussions with Damon about the progress of RFM in Louisiana. He has intimated to me that some in the Department is not entirely satisfied with the GT/RFM work and approach partly because as it is not a good fit with the fisheries they are managing. As part of these ongoing discussions we have been developing a proposal to address these issues at an international level, preliminarily called “Best Practice Guidelines for the coastal/inshore multispecies fisheries” – aimed at looking at better ways to measure performance of these fisheries against the FAO CRRF. The end goal would be something similar to the other technical guidelines which support the CRRF.

We met to discuss future cooperation and how we could progress these international guidelines further - we have been exchanging draft proposals to submit for funding (in Australia: FRDC/CRC/SFM?). The following next steps were tentatively agreed:

April/May 2014 : Project proposal drafted and submitted including draft structure of guidelines.

June 2014: DM and SS draft very rough guidelines for discussion.

June/July 2014: US (Gulf) holds first technical working group to develop first draft using GT guidance document and certification requirements. Circulated for comment amongst project partners and participants.

August 2014: Australia holds second technical working group after RFM workshop using Australian GT guidance document with Australia/New Zealand/Indonesian participants (if possible). Circulated to project partners and participants for comment

October 2014: Conference in New Orleans (already planned for other reasons) with a session on guidelines (tbd).

**Dave Garforth, SAI Global**

I discussed the progress of Fisheries B assessment – he hopes that a draft would be available mid to end April.

I also briefed Dave about the discussions I am having with Louisiana. He sees the rationale for some form of second or third party health check for management frameworks – which was the original intention of the GT RFM program – but it has moved more towards an MSC type approach. Dave said that the v.1.3 of the Conformance Criteria may also be more relevant.

The relationship with SAIGlobal remains in transition – according to Dave, the focus is on generating income, and in SAI Global’s view, fisheries certification is not generating enough e.g. 10 fisheries/year for MSC- divided amongst a number of certifying bodies. Dave does not know what the outcome of the

transition will be but confirmed that their focus will be in North America in the short term until there are sufficient resources in place to expand.

### **Erin Hudson, Monterey Bay Aquarium (MBA/Seafood Watch)**

Seafood Watch prioritises which species they undertake assessments on based on a survey of retailers, business partners and NGO partners. These are paid for by MBA and Packard Foundation. All assessments are based on publicly available documents, and in some cases, SW assists clients to get these documents "up to scratch" to enable them to be publicly available.

They are trialing a new program over the last 9-12 months called the External Assessment Program:

([http://www.seafoodwatch.org/cr/cr\\_seafoodwatch/content/media/MBA\\_SeafoodWatch\\_2013\\_ExternalAssessmentModel\\_101.pdf](http://www.seafoodwatch.org/cr/cr_seafoodwatch/content/media/MBA_SeafoodWatch_2013_ExternalAssessmentModel_101.pdf)).

Under this programme, third parties (eg. companies, industry association, farm) can contract Seafood Watch to undertake an assessment at a cost of between US\$10000-15000. The same assessors (generally graduate students) and peer reviewers are used as with the Seafood Watch program. However these third parties cannot use the Seafood Watch logo and there is no traceability. The Mexican handline yellowtail snapper fishery has just undergone this process.

### **Martin Excel, Austral Fisheries**

There is a need for alternatives/competition to MSC especially for some of the smaller fisheries in Australia. Doesn't think certifying the management framework will be credible enough (equated it to Friends of the Sea) but thought there was a case for an MSC-lite in the form of a national fisheries management standard. Also observed that MSC may develop new strategies to deal with fisheries that don't fit the bill.

Noted that currently, sustainability is "a gimme" for companies - it is expected that fish should come from sustainable sources. Wondering what the next big thing will be.

### **Gudný Káradóttir ,Marketing Manager for Iceland Responsible Fisheries**

Iceland is reverting back to the RFM specifications and will have those ISO 17065 accredited (GT will help) in Ireland. They think that the focus on origin is most important to them.

### **Graham Young, Seafood Scotland (Seafish)**

The Responsible Fishing Vessels Scheme was evaluated last year and report still not publicly available. However, likely that the focus of any new scheme will be on social welfare – workers rights and conditions and care of catch given that environmental credentials do not seem to be so important as taken care in certification programs.

Seafood Scotland focusing on clean green imaging and origin. Many of the smaller fisheries cannot afford certification or see that there is any economic benefit of doing so. There is some discussion about MSC certification for all North European cod stocks.

Issue of social licence becoming important for some inshore fisheries in Scotland as under threat from renewable energy: offshore wind farming and tidal power. These fisheries may need to demonstrate their sustainability credentials, although arguably these installations may also operate as FADs.

### **Jodie Campbell, Senior Fisheries Analyst - Certification and Market Access, MPI New Zealand**

Recently recruited to investigate the opportunities/possibilities for NZ fisheries which do not want to go for MSC certification as part of the Deepwater and MPI Partnership. Was at Boston to represent Deepwater Group at GSSI (who are members) and gave a short presentation at the GSSI mini-conference. NZ is looking at other options- they want to increase value of their exports by focusing on origin and are exploring the possibility of a traceability standard (note: FAO presented traceability guidelines at COFI subcommittee in Bergen in Feb 2014) and was talking to SAI Global re development of such a NZ standard. She is also interested in the RFM work here and in general the trends in sustainability certification in the region. I invited her to the end of project workshop although she is due to have a baby then. She has worked for MRAG managing the MSC certifications in New Zealand so she is familiar with the processes. She also has concerns about the direction GSSI may be heading re standard setting or benchmarking.

### **Victoria Chomo, Fishery Industry Officer (Trade), FAO**

Briefly discussed developments at the recent COFI meeting. The main concerns of developing countries are that certification does not become a barrier to trade. Dr Chomo gave a presentation at the GSSI mini-conference.

### **GSSI Mini-Conference**

A half day mini-conference was held by GSSI to discuss progress. It was announced at the conference that the discussions of the meeting as well as the presentations would be made publicly available quickly. For this reason, few notes were taken of these presentations. The conference was well attended with @ 150 people there. These are attached.

Presentations focused on the progress of the technical working groups and the discussions of the Steering Board which now has Dr Jason Clay from WWF on it. Based on corridor talk, this has caused some discomfort amongst some members/followers of GSSI as well as the proposals to include ISEAL (who is chairing the process working group).

On the basis of the presentations made, it appears that GSSI is moving away from being a purely a benchmarking tool to something between a standard and/or a ranking system. There are three reasons to come to this observation:

- Dr Jason Clay (WWF) mentioned that one of the objectives of the tool was continuous improvement.
- Provisions/criteria of schemes would be given Tiers based on the normative documents used to benchmark (eg. FAO CRRF, FAO Eco-labelling guidelines). For example, a clause/criteria that met these requirements would be considered Tier 1, whilst those that exceeded these requirements would be considered a Tier 3. The rationale for this was that (a) different clients may be looking

for something which exceeded requirements for particular criteria (b) this would lead to continuous improvement. The Chair of the Steering Board (Kevern Cochrane) said that the tiering would not change but schemes would not be ranked – GSSI would provide transparent ratings against different criteria.

- Some of the comments of the Steering Board members suggested that the tool was veering towards setting a standard by being very specific about the criteria (this was particularly the case for aquaculture).

Comments from the floor included some adverse reaction to the Tiering system arguing that GSSI was no longer a benchmarking (yes/no) but a ranking system. Arguments were raised that this would discourage schemes to be benchmarked and as it was a voluntary exercise, the objective of GSSI would not be fulfilled. Dr Cochrane (Chair of the Steering Board) said that the tiering system would not be changed but that the working groups and the Steering Board would consider the comments raised. Some eNGOs, particularly in the aquaculture sector were not happy with the absence of social and economic benchmarking criteria as these are already included in many schemes.

### **MSC Briefing Session**

This was a well attended session covering the developments in MSC over the last 12 months – some key points:

- 221 fisheries now certified but a decrease in the rate of growth of number of fisheries in assessment. (around 10 p.a.)
- Of the 480,000mt of consumer facing products, 50% are accounted for by Germany.
- 60% of Canadian landings are certified or in full assessment
- Food service industry is a growing business in N.America
- The review process for the Fisheries Standards has been completed – a new standard will be released in June 2014 and will apply to new fisheries from October 2014. The new standard aims to reduce cost and complexity by reducing auditing requirements and cost of auditing; incorporate international best practice in management; comply with FAO/ISO/ISEAL; reduce the number of performance indicators. It also includes assessment of the cumulative impacts of MSC certified fisheries, management of unwanted catch and impacts on vulnerable ecosystems. A Peer Review college will be established which will have more independence and rigour than current peer review process and the standard will be compliant with ISO17065.
- Starting a Chain of Custody review process

The presentation (all 75 minutes of them) can be viewed here:

<http://www.msc.org/newsroom/video/msc-update-at-seafood-expo-north-america-boston-2014>



**ATTACHMENT 1: PRESENTATION OF PATRICK MCGUINNESS, FCC on his roadshow re RFM Feasibility Trials (deleted introduction to RFM program but can provide full presentation on request)**

## OUTCOME SUMMARY OF FEASIBILITY TRIALS

### Fisheries under Feasibility Assessment

- Lobster Trap
- NS trawl Pollock
- NFDL Fix Gear Herring
- BC Pacific Ocean Perch

### Overall Outcomes

- Substantial amount of compliance between Canada's management system (through the lenses of the 4 fisheries) and the FAO Conformance Criteria
- 2 fisheries had no apparent problem in passing; one would have some difficulty; and one would have significant difficulty
- Barriers (gaps) were identified where the assessment team could not assign High confidence. These may be a result of:
  - (i) absence of information or data;
  - (ii) lack of conformity of the fishery at some level;
  - (iii) low synergy between the conformance criteria and how Canada approaches a particular aspect of fisheries management that could otherwise demonstrably meet the criteria with some additional guidance.
- Working understanding of the application of the FAO Model and its potential connection to Canada's fisheries management system; and valuable learnings by all parties moving forward.

**Results of the evaluation of 4 test fisheries  
against the 14 Fundamental Clauses and 139  
Supporting Clauses**

- 16 Supporting Clauses were problematic in one or more of the fisheries
- 80 Supporting Clauses were compliant
- 43 Supporting Clauses were intended for enhanced or transboundary fisheries or otherwise found not to apply

**Summary of Identified Gaps  
in the Four Fisheries**

**Fundamental Clause 1**

**Supporting Clause 1.2.3 – All fishery removals and mortality of the target stock(s) shall be considered by management.**

▪ **Lobster**

Gaps in reported catches from the commercial and aboriginal FSC fisheries (no logbooks); absence of an estimate of unaccounted for catches.

▪ **Herring**

Gaps in reported catches from commercial, recreational and most apparently, bait fisheries; drop-offs in gillnet fishery; absence of an estimate of unaccounted for catches.

▪ **Pollock**

Estimate for reported gaps in accounting of catch in other groundfish fisheries, discards and recreational fisheries.

**Fundamental Clause 3**

**Supporting Clause 3.2.1 – Excess fishing capacity shall be avoided and exploitation of the stocks remain economically viable.**

▪ **Lobster**

Fishing capacity could be measured if necessary but is not currently; absent this metric, no means to ascertain whether excess capacity situation is in play during the fishery or between fishing seasons

No management strategy to counter excess fishing capacity were it found to exist

**Fundamental Clause 3**

**Supporting Clause 3.2.5 – Depleted stocks shall be allowed to recover or, where appropriate, shall be actively restored.**

▪ **Herring**

Spring spawning component has remained at low productivity levels for almost a decade.

Rebuilding strategy (productivity objective, appropriate management measures, controls) not evident and impacted by other gaps (removals, no formal stock assessments between 2003 and 2008.

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*Depleted stock (FAO) - a stock driven by fishing at very low level of abundance compared to historical levels, with dramatically reduced spawning biomass and reproductive capacity*

**Fundamental Clause 4**

**Supporting Clause 4.1 – Reliable and accurate data (for assessing fisheries and ecosystems) including retained catch, bycatch, discards and waste.**

▪ **Pollock**

DFO's Sustainability Checklist (January 2012) identifies gaps in catch monitoring and reporting for (i) unreported/misreported catches, (ii) discards of the target species, (iii) catches of the target species in other non-groundfish fisheries, and (iv) recreational catches.

▪ **Herring**

Lacking important information on the bait fishery and discards of the target species; research knowledge gaps with respect to the productivity of the target species, habitat, and ecosystems.

#### **Fundamental Clause 4**

**Supporting Clause 4.1.2 – Timely, complete and reliable statistics on catch and fishing effort; use of research results for setting management objectives, reference points and performance.**

- **Lobster (see also 1.2.3)**

C/E data are not systematically captured; research data and findings are used in the design of management measures for the fishery; the fishery is not currently PA compliant.

- **Pollock (see also 1.2.3)**

Extent to which fishery C/E data from FG fleets is timely, complete and reliable, and used in fishery management, reference points and performance (ie Eastern Component).

#### **Fundamental Clause 4**

**Supporting Clause 4.2 – Establishment of observer scheme**

- **Herring and Lobster**

All DFO Regions have longstanding, fully functional observer schemes in place with requisite regulatory authority to deploy observers to all established and experimental commercial fisheries.

Issue is whether observers must be deployed to these fisheries for the stated purpose given that (i) real impacts/benefits (data collection and compliance) could be marginal given the number of fishing vessels involved, (ii) costs to fishers (to be 100% as of 2013), (iii) program logistical challenges, and (iv) other deployment priorities.

#### **Fundamental Clause 5**

**Supporting Clause 5.2.1 – Research capacity to assess the effects of climate and environmental change on stocks and aquatic ecosystems, ecosystem changes etc shall be established.**

- **Pacific Ocean Perch**

Ecosystem studies on this stock complex are/were not available.

Some basic environmental data are collected but these are not linked to stock assessment.

#### Fundamental Clause 6

Supporting Clauses 6.1 to 6.1.5 – The current state of the stock shall be defined in relation to reference points or relevant proxies or verifiable substitutes etc. and action taken when points are approached or exceeded.

- **Lobster (all supporting clauses)**

A precautionary approach framework has not been developed for this fishery, but efforts are underway to do so.

- **Pacific Ocean Perch (6.1.4 – Management actions shall be agreed to when data and analyses indicate reference points have been exceeded)**

Agreed management actions (process) may not be fully/formally documented; however, there is evidence of conformance in the form of longstanding practices culminating in IFMP adjustments.

#### Fundamental Clause 7

Supporting clauses 7.1 and 7.2.3

- **Lobster (7.1 - Precautionary approach shall be applied widely to conservation, management, and exploitation of living aquatic resources etc).**

A precautionary approach framework has not been developed for this fishery, but efforts are underway to do so.

- **Pacific Ocean Perch (7.2.3 – Contingence plans shall be agreed in advance in response to serious threats to the resource etc).**

It is unclear what contingency measures have been agreed in advance.

Fundamental Clause 8  
Supporting Clause 8.3 – Fleet capacity operating in the fishery shall be measured; statistical data and fleet authorizations shall be maintained.

- **Pollock and Herring**

Fleet capacity of all fleets operating in the fishery is not routinely measured by the Management Authority but it could be since relevant statistical data are maintained according to international standards.

Importance of knowing a fleet's capacity is to allow for mechanisms to be implemented to reduce capacity commensurate with the sustainable use of the resource.

**Fundamental Clause 8**

**Supporting Clause 8.4 – Encourage the development and implementation of technologies and operational methods to reduce waste and discards of the target species.**

▪ **Herring**

Operational methods may best offer practical approaches for reducing waste and discards in a FG herring fishery eg. improved selectivity, gear dimensions, placement of gear etc.

**Fundamental Clause 9**

**Supporting Clauses 9.1 – Protect depleted stocks and facilitate their sustained recovery; associated resources and habitats that are critical to well being of depleted stocks are restored.**

▪ **Herring (Spring Component**

Evidence suggests that stock's productivity is well below historical highs; recruitment improvement has not been observed; a recovery strategy not in play; national SBA policy not operationalized at this time but process in place to identify sensitive non-benthic habitats of significance to fishery.

**Fundamental Clause 9**

**Supporting Clauses 9.4 – Minimize the loss of fishing gear and ghost fishing effects of lost or abandoned fishing gear.**

▪ **Herring**

Gear loss occurrences have not been quantified, studied or assessed relative to impacts on the fishery and the ecosystem.

DFO indicates that fishery is not likely harmed or causing serious or irreversible harm to ecosystem.

**Fundamental Clause 13**

**Supporting Clauses 13.1 – Assess the impacts of environmental factors on target stocks and those belonging to same ecosystem or are associated with /dependent upon the target stocks etc.**

▪ **Pacific Ocean Perch**

There does not appear to be assessment of:

- (i) the impacts of environmental factors on target stock (oceanographic, atmospheric data etc. collected but not applied),
- (ii) species belonging to the same ecosystem or associated with or dependent upon the target stocks (trophic level interaction), or (iii) the relationship amongst the populations in the ecosystem.

Biomass data for the species caught in association with POP are observed and documented.

**Fundamental Clause 13**

**Supporting Clauses 13.3 – Role of the “stock under consideration” in the food web shall be considered and if it is a key prey species in the ecosystem, measures shall be in place to avoid severe adverse impacts on dependent predators.**

▪ **Pacific Ocean Perch**

The role of the “stock under consideration” in the food web does not appear to be considered as there is no trophic level interactions assessment in the groundfish fishery.

However, Pacific Ocean Perch does not appear to be a key prey species in the ecosystem.

## Receptivity of Export Market to MSC & Alternative Certification Regimes

## Markets- Certification Activity

### EXPORT FOOD RETAIL MARKETS

Country/Region	Using MSC	Evidence of Markets Open to alternatives (in use)	Pressure for certification	Comments on Alternatives	MSC Sensitive Companies
USA	Yes	Yes	High from Environmental Groups	Alaska, Louisiana, Texas, Mississippi, Florida, Alabama states using FAO based models	
UK	Yes	Yes	Moderate from Environmental Groups	Responsible Fishing Scheme, FAO Based Certification being used	J.Sainsbury
GERMANY	Yes	Yes /No	High from Environmental Groups	Some market resistance from some retailers	Example
N. EUROPE/ SCANDINAVIA	Yes	Yes	Limited		
FRANCE	Yes	Yes	Limited	(French national program in development)	
SPAIN	No	Untested	No / Limited		
ITALY	No	Yes	No/ Limited	Friend of the Sea	
JAPAN	Yes	Yes	Limited	National Program Development	
CHINA	No	Untested	Limited		
OTHER ASIA	No	Untested	Moderate from Environmental Groups		

## Markets- Certification Activity

### EXPORT FOOD SERVICE MARKETS

Country/Region	Using MSC	Evidence of Markets Open to alternatives (in use)	Pressure for certification	Comments on Alternatives	MSC Sensitive Companies
USA	Yes	Yes	High from Environmental Groups	Alaska, Louisiana, Texas, Mississippi, Florida, Alabama states using FAO based models	
UK	Yes	Yes	Moderate from Environmental Groups	Responsible Fishing Scheme, FAO Based Certification being used	
GERMANY	Yes	Yes /No	High from Environmental Groups	Some market resistance from some retailers	
N. EUROPE/ SCANDINAVIA	Yes	Yes	Limited		
FRANCE	Yes	Yes	Limited	(French national program in development)	
SPAIN	No	Untested	No / Limited		
ITALY	No	Yes	No/ Limited	Friend of the Sea	
JAPAN	Yes	Yes	Limited	National Program Development	
CHINA	No	Untested	Limited		
OTHER ASIA	No	Untested	Moderate from Environmental Groups		



# COSTS

## Key features of FAO Based assessment

- Costs are not duplicated
- Assessment process is not complicated
- Measurements are based on the fishery management system's approach and does not prescribe a set format
- Measurement is consistent to FAO criteria but metrics are based on the fisheries own management system approach
- Gaps are identified as non conformances
- Corrective action is not directional
- The Standard translated directly to FAO CCRF/FAO Guidelines- predictable

## Reducing costs of FAO Based Assessment

- Does not require a pre-specified client submission of information according to a set format. CB takes the available information and draws out the evidence to support the level of conformity
- Reviews the fishery management systems' own performance metrics to evaluate conformity rather than prescribing a set of alternative metrics that must be adopted. It does measure effectiveness of the fishery management metrics and performance
- Is non intrusive on fishery regarding corrective actions
- **No royalties. However, a Canadian logo could be established with associated fees (eg. Iceland)**

### Existing Example- ALASKA SALMON CERTIFICATION

- All Alaska salmon fisheries under federal/State management
- All Pacific salmon species (5); all stocks
- All gears (seine, drift gill, set gill, troll, (wheel)
- All 4 regions
- ONE CERTIFICATION carried out with multiple assessment units identified
- Certificate accessible to all commercial permit holders

### Existing Example - ICELANDIC COD CERTIFICATION

- All Icelandic cod fisheries within 200mile EEZ by all fleet sectors (large bottom trawlers, inshore trawlers, seine netters, gill netters, long liners, jiggers).
- One stock
- All Icelandic fishing companies with cod quota can access the certificate
- Also cod landed in other fisheries with legitimate IFQ for cod or ability to transfer IFQ
- ONE CERTIFICATION CARRIED OUT with multiple assessment units identified

### Target Assessment Days Per Fishery

Assessment Step	Single Gear, Single Stock	Multiple Gears, Single Stocks	Multiple Gears, Multiple Stocks
• Application and Validation	15 days	22 days	35 days
• Full Assessment	58 days	88 days	120 days
<b>TOTAL</b>	<b>73</b>	<b>110</b>	<b>155</b>

The above time lines are for example only.

Applicants will typically be charged at a daily audit rate by Certification Bodies

This daily audit rate could vary between Certification Bodies and maybe subject to additional travel and subsistence costs.

## Management Entity Options

### 1. No Entity

- Operate as MSC does;
- Fishery issues Request for Proposal from certification companies accredited to assess fisheries regarding the FAO-based Responsible Fisheries Management Certification program

### 2. Bare-Boned Entity

- Registered not-for-profit entity
  - own & control logo;
- Contracted part-time manager;
- Members
  - Certified fisheries;
  - Chain of Custody holders;
  - Associate Members – retail, food services, etc.
- Operation
  - (i) web-site: - identify certified fisheries
    - identify chain of custody holders;
    - identify fisheries under assessment;
  - (ii) manage logo
- Funding
  - logo royalties;
  - Membership fees;
- Cost
  - \$20K – 30K annual

### 3. Enhanced Entity

- Registered not-for-profit entity;
- Promote certification; own & control logo;
- Provide initial liaison between Canadian fisheries applicant and certifying company regarding the Canadian Guidance document
- Provide technical advice to certify body to streamline assessment & eliminate redundancy in the assessment;
- Board of Directors (10-12)
- 4 Managing Directors that actually run the operation with the Chair & Vice Chair being industry members (no compensation). Two part-time contracted Managing Directors that do the work;
- Represents the Brand at Trade Shows, liaison with other national brand holders (ASMI, Iceland Responsible Fisheries Foundation, etc.)
- Etc.
- Cost
  - \$50K – 100K on-going