

# Monterey Bay Aquarium Seafood Watch®

## Seafood Watch® Criteria for Fisheries

### Summary of comments from Public Consultation 4 and Responses

#### Preamble

Seafood Watch assesses the environmental sustainability of fisheries and aquaculture by compiling relevant science-based information and evaluating that information against our standards (called 'Criteria' elsewhere on this website). We periodically revise our standards to ensure we account for developments in the scientific understanding of the ecological impacts of fisheries and aquaculture operations, as well as in our understanding of what producers and managers can do to mitigate those impacts. Seafood Watch last underwent a criteria review process in 2014-2015. However, in 2016 we initiated a public comment period from September 18, 2016 to October 18, 2016 to review minor proposed edits and clarifications to the standard, and received comments from one organization. Seafood Watch has carefully considered all comments received. Below we present our responses to all comments received as part of the official Public Comment Period as per the requirements of the ISEAL Code of Good Practice Standards-Setting Code<sup>1</sup>.

#### **Criterion 2: Use of the Unknown Bycatch Matrix and Productivity-Susceptibility Analysis**

**Question:** We are seeking comments on the use of the Unknown Bycatch Matrix vs. the Productivity---Susceptibility approach. Do you have any feedback as to whether it is more appropriate to score fisheries with known bycatch composition, but unknown status of the bycatch species, using our Unknown Bycatch Matrix for taxon groups, or using Productivity---Susceptibility Analysis for each individual species?

**Stakeholder comment (paraphrased):** The commenter believes it is more appropriate for Seafood Watch to use the Unknown Bycatch Matrix (UBM) to score each taxa, rather than

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<sup>1</sup> <http://www.isealalliance.org/our-work/defining-credibility/codes-of-good-practice/standard-setting-code>

scoring species under the PSA. Returning to use of scoring under the PSA in response to potentially lowered scores is not aligned with the Monterey Bay Aquarium's commitment to inspire conservation of the oceans. Returning to an evaluation method that results in potentially inflated scores for fisheries with bycatch is contrary to Seafood Watch's definition of sustainable seafood, which maintains that wild-capture fisheries should ensure that the abundance of both targeted and incidentally caught species is maintained in the long term. Making evaluation decisions based on maintaining high ratings furthers the risk that substantially harmful fisheries will receive ratings as "good alternatives" instead of fisheries to avoid.

**SFW Response:** Thank you for the comment. To clarify, the proposed change is not an attempt to inflate scores or to avoid lowering scores by using the unknown bycatch matrix. The proposed change is a response to finding that attempting to use the unknown bycatch matrix as a time-saving mechanism resulted in inconsistent scoring. The PSA approach is not perfect, but more accurate than the UBM, as it is species-specific and utilizes both productivity and susceptibility information, while the UBM is based on susceptibility to gear only and is very broadly defined at the taxon level, not species level. Because it is so broad, to err on the side of caution and to incentivize data collection (as the UBM is developed for use when bycatch species are not known), it is developed to be precautionary and result in lower scores than are normally achieved by scoring individual species. However, the concern with using the UBM in cases where bycatch species is known is not so much that scores are too low, as that scores are not consistent with what they would be if we used all the data on hand. As such, it is considered most robust to continue with the approach that was approved in last year's process and use the PSA approach for known bycatch species, other than sea turtles, seabirds, marine mammals, and sharks. To address concerns that the PSA may not be precautionary enough when vulnerable species are caught, we have added guidance that the UBM should be used for those vulnerable taxa. This is considered appropriate both because we have developed more robust scoring tables for these vulnerable taxa, and because the PSA was not developed to be appropriate for use with these taxa, excepting perhaps sharks (it is appropriate for finfish and invertebrates). We also include guidance that the PSA score can be overridden if there is reason for concern that would lead to more precautionary scoring.

### **Criterion 3: Bycatch monitoring**

SFW proposed edits to Factor 3.3, putting bycatch monitoring in the context of the scale and potential impacts of the fishery. Commenter supports the added language clarifying that existing bycatch monitoring can be insufficient given potential bycatch impacts of the fishery.

**SFW Response:** Thanks for the feedback. No changes required.