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Summary of Comments received during Public Comment 1

Preamble

The following summarizes public comments on the Seafood Watch (SFW) Criteria for Fisheries. Responses to comments, including topics discussed with the Fisheries Technical Advisory Committee (TAC) are *italicized*. SFW welcomes input from TAC members throughout the standard revision process and from all others during defined public comment periods.

Criterion 1

Definitions

Several respondents requested improved definitions for “conservative harvest strategy” for forage species, “regions” regarding fishing mortality, and clarity differentiating between “peer-reviewed” and “accepted by relevant scientific body” relating to stock assessments. *For each of these, SFW will further consult with the TAC, then review and clarify.*

Data Limited Fisheries

Several comments focused on data-limited scenarios. These included acknowledging that data limited fisheries do not necessarily have a traditional stock assessment and the prospect of scoring fishing mortality as “low” or “very low” is unlikely because the current approach disadvantages low impact fisheries. *SFW is aware of many challenges associated with data limited fisheries and discussed this topic with the Fisheries TAC and Multi-Stakeholder Group (MSG). SFW aims to develop guidance to ensure that analysts can understand and incorporate data-limited methodologies into an assessment; however, there are concerns regarding the scoring of data-limited and data-absent situations. To incentivize data collection to improve the accuracy of SFW assessments, the highest scores only will be achieved when there is enough information to prove a particular outcome. SFW also distinguishes between data limited and low impact, as one does not always equal the other.*

SFW received a request to incorporate Traditional or Local Ecological Knowledge in combination with or as a supplement to scientific studies. The comment also specified this type of information should not be used as a standalone method for evaluating stock health but suggested it is a viable and valuable source of information. *Seafood Watch discussed this topic with the Fisheries TAC in the context of the data-limited fisheries assessment and will provide additional guidance.*



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Scoring

Seafood Watch received requests to explain and possibly re-evaluate the weight of each criterion, including a consideration of increasing the relative weight of the management criterion (criterion 3). *Seafood Watch gives equal weighting to each of the 4 criteria within the Fisheries Standard when determining the numerical scores as each is considered to have equal importance. Effective fisheries management is critical in achieving sustainable fisheries. The outcome-based indicators in criteria 1 and 2 provide an important evidence-based assessment of how effective the management system is; this is particularly important for desk-based assessments allowing Seafood Watch to identify whether what is written in a management plan is being implemented and whether it is achieving its goals. There is additional weight given to criteria 1 and 3 (impact of the fishery on the rating species, and management) when considering the scoring rules that Seafood Watch uses to determine the overall rating (i.e. Best Choice, Good Alternative or Avoid), where a green score in criteria 1 or 3 is needed to achieve a Best Choice, and a critical score in criterion 3 will result in an Avoid overall. Seafood Watch considers the current weighting to be appropriate and does not plan to investigate further at the present time.*

Also, one comment highlights an inconsistency in language surrounding the acceptable age of a stock assessment for a “low concern” score, but not for a score of “very low concern,” and suggested creating consistent language in the standard for both. *SFW will make sure to clarify this in the appropriate tables within the standard.*

Fishing mortality

Comments emphasized the importance of considering mortality “from all sources” and questioned the appropriateness of assigning a percentage to the “probable” amount of fishing mortality as it may be a judgement call for the assessor in certain circumstances. *SFW will better define “all sources” of mortality and clarify the “probable” percentage of fishing mortality, which will be used on a case-by-case basis as guidance to quantify the likelihood of fishing mortality. Quantitative information will come from a stock assessment if one is available.*

IUCN use

Respondents asked SFW to re-evaluate its reliance on IUCN assessments older than 10 years when assessing species abundance, even in the absence of any other information. *Seafood Watch has determined that IUCN assessments greater than 10 years can be overridden if local information is available and will revise the standard to ensure that if local information is used, a recent assessment has been carried out.*

Scoping

A respondent requested that SFW include production volume for each specific recommendation, which would help inform seafood purchasing decisions. *SFW will improve guidance on including volume data in SFW reports; however, in most cases, specific data on this level may not be available.*

Within this same request, Seafood Watch was asked to reconsider rating landed non-target species within assessments for target species. *SFW discussed scoping issues with the Fisheries TAC; members*



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supported maintaining highly granular assessments although it continues to require case by case decisions based on location, gear type and level of production. SFW will continue to review its scoping approach within the context of what changes it aims to influence.

No response required

Several comments supported the current standard included remarks on the challenges of relying on traditional stock assessments when assessing highly fluctuating species and working with data limited fisheries. There was support for the additional guidance for Criterion 1.2, fishing mortality. No responses were necessary in these instances.

Criterion 2

Definition of Main Species

Concerns were raised regarding the criteria used to determine a main species and therefore included within the assessment as a Criterion 2 species. It was noted that the phrase ‘catch occurs regularly’ has not been defined and is relevant when determining whether an overfished or Endangered, Threatened or Protected (ETP) species should be considered further. The current language provides an example of >5% of a sustainable level of mortality as being a significant contributor to conservation concern and grounds for including the species within the assessment; however in most cases, the sustainable level and/or total mortality are unknown and therefore it is impossible to determine the significance of a fishery’s impact using such a method. *SFW discussed with the Fisheries TAC the challenges of defining ‘main species’ during the assessment process, particularly in a data-limited context. A precautionary approach dictates that if there is any doubt regarding the impact of the fishery on a particular species, it should be included in the assessment. To better determine which species (or stocks) should be included as a main species within an assessment, SFW is drafting a decision tree that will consider different sources of information.*

Substantial Contributor

A respondent suggested including a more quantitative definition of ‘substantial contributor’ in the glossary. SFW has long sought to improve this definition and is linked to the discussion on main species above. *SFW discussed the ‘substantial contributor’ definition with the TAC, which recommended revising the definition. SFW will consider creating a decision tree to better discern scoring (as currently a determination of non-substantial contributor is typically the difference between low concern and high concern).*

Bait Fisheries

There were comments with differing opinions on how SFW assesses bait fisheries. Some commenters suggested that Seafood Watch should consider the broader impacts of a bait fishery that supplies the fishery being assessed, for example bycatch and/or management concerns. Others suggested that including additional factors may be difficult and unwieldy, but that where information already exists (for example an existing SFW rating) it could be included. *SFW discussed assessing bait fisheries with both the Fisheries and Aquaculture TACs, as similarities have been drawn between bait use and aquaculture*



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feed ingredients. It was determined that in most cases, the bait use is a minor impact of a capture fishery relative to the impact on target species, such that the impact of a bait fishery need not be considered. However, in some cases, bait species form a major part of the diet of the target species and involve large volumes that could be impacting the marine ecosystem; in these cases the impact of the bait fishery should be considered, and a system similar to the feed ingredient scoring system in the aquaculture standard may provide an efficient and consistent way of assessing the broader impacts of bait fisheries. SFW will develop a filter to identify when bait fisheries should be considered and draft a scoring system similar to the aquaculture standard.

Respondents discussed the difficulty of obtaining information on bait use and the fisheries that supply the bait. *SFW is aware of these challenges and agrees that it needs to develop additional guidance when data are unavailable within the context of the feedback received from the above discussion on how detailed an assessment of bait fisheries should be.*

Unknown Bycatch Matrices (UBMs)

One comment raised concerns regarding the generic approach of the UBMs and that such a system would not incentivize the development of reduction mechanisms to minimize bycatch impacts. *SFW disagrees with this statement as the UBMs are very conservative and typically result in low scores, often with a red score for criterion 2. This approach incentivizes the collection of data and the development and use of mitigation measures that would lead to an improvement in this score. SFW will develop language to clarify this approach in the standard.*

Criterion 3

Inclusion of 70% of main, primary, targeted and retained, native species/stocks by number:

There were several comments questioning why SFW uses 70% of species/stocks by number as a cut off for scoring effective harvest management strategy and implementation for a fishery, noting that this threshold is arbitrary, confusing and may not make sense for fisheries that catch transboundary stocks that are subject to different management throughout their fished ranges. It was suggested that SFW evaluate this factor for 100% of a species in a fishery and/or to evaluate management by a volume threshold. *SFW discussed this topic with its Fisheries Technical Advisory Committee who suggested that assessing by volume rather than by number of stocks would be more appropriate, however, caution should be exercised to ensure that significant impacts are not missed, particularly for vulnerable species and specific guidance may be necessary when assessing fisheries in which the rated stock is a small proportion of the catch and when assessing full retention fisheries. Seafood Watch may conduct an impact assessment to better understand the effect of switching to assessing a fishery's management effectiveness by volume rather than by number.*

Factoring in Fishing Subsidies

There was one comment requesting that Seafood Watch's harvest management strategy and implementation factor address subsidies that contribute to overcapacity & overfishing as well as illegal unreported and unregulated fishing. This would be in alignment with Sustainable Development Goal 14, Life Under Water, Target 14.6. *While SFW does not explicitly state in its Fisheries Standard language that consideration of subsidies that contribute to poor stock status should be included in our assessment,*



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if subsidies negatively affect fish stocks and there is documented evidence for this they could be addressed using the current language. SFW can add specific guidance to analysts performing SFW assessments to research whether the fishery/fisheries under assessment have perverse subsidies and score based on their impacts.

Language

A comment regarding the use of language within the standard suggesting that strategy implementation and compliance seem to be conflated but may not be the same was submitted. *SFW will revisit the language in 3.1.1 to resolve the confusion here. Compliance is currently addressed in the standard under section 3.4.*

Climate Change

Climate change was addressed in several comments regarding what defines a native species and the importance of responsive management. *SFW discussed the need to potentially revise the native species definition with the TAC and will consider including additional clarifying text to the management criterion on preparedness and responsiveness to the impacts of climate change on fisheries.*

Data Limited Approaches

A question was submitted inquiring why there are many criteria for data-poor fisheries in the appendix of the standard, but SFW emphasizes quantitative reference points in the criteria. *SFW responded that when available, SFW preferentially uses quantitative reference points in our assessments. When only data limited approaches are available, we refer to the table in Appendix 7 as general guidance for appropriate approaches. During this standard revision process, SFW is updating and expanding upon the description of acceptable data limited approaches.*

Research and Monitoring

There were two topics addressed in the comments related to research and monitoring. First, respondents questioned why this sub-factor is separated out given that aspects relate to topics elsewhere covered in the fisheries standard, for example this sub-factor addresses how management collects data on and assesses stock status and bycatch (particularly related to endangered, threatened and protected (ETP) species) and how compliance with regulations is measured and evaluated. Second, respondents offered suggestions for how to better assess the adequacy of at sea monitoring, including specifically assessing coverage and verification as well the sufficiency and timeliness of data analyses that are used to inform management decisions. It was highlighted that guidance on electronic monitoring practices and other at sea monitoring practices should be provided to analysts conducting SFW assessments. *SFW is considering splitting research and monitoring amongst two sub-factors, one which would assess aspects related to 1) data collection and analysis informing determination of stock status for retained species and catch composition in the fishery and 2) monitoring targeting compliance with regulations which would be assessed in the same sub-factor as enforcement of management regulations. Changes in standard language for these subfactors will be proposed during the next public comment period and will consider suggestions made during this first public comment period. Improved guidance to analysts conducting SFW fisheries assessments on how to better understand how the various forms of at sea monitoring (including electronic monitoring practices) with respect to scoring the applicable subfactors will be developed once the new language in the standard is developed, as guidance is not formally a part of the written standard.*



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Enforcement of Management Regulations

Comments related to enforcement of management regulations included a request to better define “systematic non-compliance” to better distinguish bad actors in fisheries that occur in different management jurisdictions and a request to explicitly include Illegal, Unreported and Unregulated (IUU) fishing management measures in this sub-factor. *SFW ratings are based on the management unit and gear type, such that if portions of the fishery have different levels of compliance, they will have separate ratings. SFW does use a threshold of 25% or more of landings from IUU in Management Strategy and Implementation (3.1) to determine if Management is "Critical". If Critical, the entire management factor is scored at the lowest level and the factors 3.3-3.5 are unscored. However, SFW will also consider additional language on IUU management measures in 3.4.*

Stakeholder Involvement

One respondent commented on this sub-factor, noting that information to score stakeholder involvement is often unavailable to analysts, and that even when the analyst can verify high participation in stakeholder processes this does not always translate to significant input to decision making. *SFW will revisit the types of information available to score stakeholder input, with particular reference to peer reviewed literature on this topic.*

Criterion 4

Habitat Impacts

There were differing opinions on our generic scoring table for habitat impacts. Those with experience using the standard have found this approach useful as it ensures consistent application of the standard and provides a relatively straight-forward approach in an area where information may generally be lacking. However, another respondent remarked that this system may be unfair to fisheries that have demonstrated a lower impact than the average for a particular gear type. *This concern has been raised before and while the number of fisheries where there is specific information on habitat impact is likely low, SFW believes that it is worth further consideration and discussed quantification of habitat impacts with the Fisheries TAC. SFW will consider additional guidance to inform the scoring of mitigation measures to incorporate fishery specific information which may modify a particular gear-habitat interaction.*

Ecosystem Based Fisheries Management

Concerns have been raised regarding the requirement for an ecosystem study to demonstrate that a fishery is not having a negative impact on the marine ecosystem, specifically that this requirement is prejudicial against small-scale fisheries that are unlikely to have the resources or attract sufficient attention from governments to result in such a study being conducted. *The aim of the current language is to reward fisheries that have a study to demonstrate minimal ecosystem impact, rather than penalize those that do not have a study. SFW can modify the language to clarify that other approaches can result in similar scores; however, it should be noted that positive scores will be based on evidence regardless of the scale of a fishery: small-scale does not necessarily equal low impact.*



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Other General Comments

Glossary Definitions

SFW received comments about revising the glossary definition for ‘reliable data’ and clarifying the definition of ‘non-native species.’ Regarding reliable data, the commenter recommended the definition include logbook data and information from government-sanctioned experimental or exempted fishing permits. *SFW discussed the definition of non-native species with the Fisheries TAC and concluded that the definition is clear, but that the goal of SFW assessments (to extirpate non-native species), may differ from that of other organizations. SFW also does not include timeframe (i.e., how long ago a species was introduced) in its definition. SFW will review and update all glossary definitions as more information becomes available through our research, particularly regarding data-limited assessment methodologies and improved technologies.*

MSC

SFW received a comment about recognizing the Marine Stewardship Council (MSC) as equivalent to a SFW Best Choice rating. *Seafood Watch currently recognizes the MSC as performing at a level consistent with a SFW Good Alternative based on a [benchmarking study](#) conducted in 2013. Some MSC certified fisheries are likely performing at a level consistent with a Best Choice, but SFW has been unable to identify them in an efficient way. SFW thus defers to the MSC at the lowest level at which an MSC certified fishery is likely to perform.*

Human Rights and Carbon Emissions

SFW received comments inquiring about incorporating human rights and carbon emissions into the SFW Standard for Fisheries. *SFW is aware of the human rights abuses and carbon emissions that have been documented in seafood production and has created two tools to assess the risks of both. The Seafood Slavery Risk Tool (<http://seafoodslaveryrisk.org/>) assesses the risk of forced labor, human trafficking and hazardous child labor in fisheries, fish processing and aquaculture. It is meant to help inform businesses about these risks in their supply chains. The Seafood Carbon Tool (<http://seafoodco2.dal.ca/>) allows businesses to see the carbon footprint of the seafood, wild or farmed, they purchase and even compare it to land-based protein sources.*

Formatting

One respondent proposed that there may be better ways to present the information in a Seafood Watch Assessment. *Seafood Watch welcomes suggestions as to how to improve the format of the assessments without losing the intent and content.*

Information Sources

A respondent recommended minimizing qualitative methods and probabilities in the assessments where possible. *SFW agrees and when possible, SFW uses quantitative assessments and relies on qualitative assessments only in the absence of any other information. The uncertainty associated with qualitative systems is incorporated into the standard’s precautionary approach.*

Scoping

One comment stated that SFW’s definition of a fishery requires clarification. The respondent noted that assessing all fishers targeting one stock as a single unit of assessment may discourage positive actions by



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individuals or groups within the whole. The comment went on to say that SFW's use of default values disregards mitigation measures employed in a specific fishery, which can lead to situations where low risk, but data-poor fisheries could mistakenly score medium or high risk. The respondent felt that this mischaracterization could lead to misleading guidance relating to some stocks. The comment concluded by suggesting that SFW recognize fisheries or sections of fisheries that have been specifically audited to standards comparable with the SFW Criteria - notably MSC and the Alaska Responsible Fisheries Management (RFM) certifications. *The scale of an SFW assessment may vary among reports to identify better/worse performers and address the concerns noted in the comment. For example, SFW could consider a 'fishery' that is managed at the state level across 3 states that all perform equally as one fishery. However, if there are differences in management such that performance differs across the states, SFW would assess each fishery at the state level to ensure these differences are recognized. SFW will not differentiate between different vessels within the same jurisdiction, stock, waterbody and gear definition. SFW defers to fisheries certified to eco-certifications consistent with a Good Alternative or better as identified in our [benchmarking study](#).*

Ghost Gear

SFW received a recommendation to reference the Global Ghost Gear Initiative's (GGGI) Best Practice Framework for the Management of Fishing Gear (BPF) as a resource. *SFW will review GGGI's Best Practice Framework and integrate where relevant (likely in Bycatch Management, C3.2).*

No Response Required

One respondent mentioned that the criteria are comprehensive and relevant to assessing fisheries impacts and endorsed the fact that SFW assesses bycatch separately from habitat impacts. Another comment mentioned that the SFW Standard for Fisheries supports the goals of the Seafood Watch program.