

December 23, 2014

Dr. Robin Pelc
Fisheries Research Manager
Monterey Bay Aquarium Seafood Watch
886 Cannery Row
Monterey, CA 93940

Re: Comments on the Monterey Bay Aquarium (MBAq) Standards for Fisheries and Salmonid Fisheries

Dear Dr. Pelc,

Sustainable Fisheries Partnership (SFP) appreciates the opportunity to participate in the ongoing Seafood Watch Standards revision, including through our participation in the Technical Advisory Committees (TACs) and Multi-Stakeholder Group. Please find in this letter some initial comments regarding the general fisheries standard and the salmonid fisheries standard drafts, which we're submitting as part of the first public consultation. In this first round, we chose to comment only on a subset of those sections highlighted for potential revision—those sections for which we felt that our expertise was most relevant and allowed for an immediate response without review of additional information. However, between now and the first TAC meeting, I plan to review suggested supporting documentation, such as the Lenfest Forage Fish task force report, in order to render my participation in the committee more substantive.

Generally, SFP is most interested in improvements to your standard that 1) make it easier to use, 2) fine-tune the placement of your sustainability “bar” so that it is reasonably situated among other available standards, and 3) improve alignment between your standard and FishSource. We also certainly support efforts to align seafood sustainability standards with best available science, which is clearly a main focus of your review.

Comments on Factor 1

1. Regarding scoring of inherent vulnerability: we approve of your proposed changes to scoring of inherent vulnerability (integration of Factors 1.1 and 1.2, inherent vulnerability will only be scored when stock status is unknown), as this will simplify things for the analysts. In those cases where vulnerability needs to be scored, we recommend that analysts be instructed to always conduct a literature search to determine whether or not there is an expert opinion available on an individual species' vulnerability to fishing. The expert opinion should be used to verify or call into question the indications of fishbase/Field et al. While this will add some additional work for the analyst, we believe that there is sufficient potential that an expert opinion exists and differs from fishbase/Field et al. to warrant a literature search in all cases.

2. Regarding integration of the NMFS “Fish Stock Climate Vulnerability Assessment” methodology into the MBAq standard: we agree that it is a timely endeavor to account for climate considerations in your standard. The NMFS method has many factors and it would be onerous for the analyst to apply the method independently. However, in those cases where NMFS or another organization has already rated the species using the NMFS method, that rating could be factored into the inherent vulnerability score as you suggest. To keep things simple, a “high” or “very high” NMFS climate vulnerability score could shift the vulnerability score up one category, from “low” to “moderate” or from “moderate” to “high.” However, before including such a rule, you would want to be certain that a large quantity of species will be scored by NMFS and that their database will be maintained for several years to come, to avoid introducing a new aspect into the standard that later becomes defunct.
3. Regarding whether or not any full stock assessment should be considered as valid (i.e., “low uncertainty”): in our opinion, not all stock assessments should be considered valid, and there can be cases where, despite the existence of a stock assessment, a rating of “high uncertainty” is still most appropriate. As there is some subjectivity involved here, we recommend providing some textual guidance to the analyst by which to gauge the adequacy of a stock assessment. Confidence intervals and any additional data deficiency not reflected in confidence intervals should be taken into account, as should results of sensitivity analysis. Whether or not the stock assessment is multi-species is another important consideration, as abundant species’ status can mask the status of less abundant species. Concern with one of these factors is grounds for a rating of “moderate uncertainty.” If there is concern across multiple factors, particularly if the species is listed by the IUCN, a rating of “high uncertainty” is warranted.

In parallel to this recommendation, we consider it appropriate to score highly vulnerable species with weak evidence that they are not overfished as “high concern.”

4. We agree with the proposal to use trend data to distinguish stocks below targets that are rebuilding from stocks below targets that are declining. Generally, we think that the SWAT should have a datasheet that accommodates time series of key statistical data for each fishery that is assessed, including biomass and fishing mortality. This is an area where collaboration (use of a common datasheet, data sharing) between MBAq and FishSource, and potentially other entities (MSC, RAM Legacy), would be sensible. In 2015, FishSource will be updating its datasheet to accommodate additional variables, and we recommend that MBAq staff review the draft datasheet and consider whether or not it can be adapted for use in SWAT. Adoption of a standardized datasheet would facilitate graphic representation of fishery status and trends in individual Seafood Watch reports, as well as analysis across multiple reports (to address questions such as, “What percent of global seafood harvest has been assessed by MBAq?”).

As for which method to use in analyzing trends, we recommend robust, parametric regression analysis to smooth for outliers, but there are species group-specific considerations to take into account in determining the length of the time series. For example, in analyzing trends in Pacific salmon escapement, the FishSource method

applies a robust regression analysis to fifteen years of escapement estimates, a long enough period of time to encompass at least two life cycles of any Pacific salmon species. However, for elasmobranchs, a longer time series would be better suited to the comparatively longer life cycles of these species. There may also be species group-specific considerations pertinent to the threshold rate of decline. Guidelines also need to be developed for cases where the time series is not long enough for adequate analysis, or data is not available for particular years: we can share with you a description of our salmon trends analysis method, which includes such guidelines, upon request.

We recommend that MBAq hire a consultant to outline general and species group-specific guidelines for conducting the trends analysis.

Comments on Factor 2

1. We propose simplifying the definition for “main bycatch species” to consist only of the following:
 - The catch of the species in the fishery under assessment composes >5% of that fishery’s catch, or
 - The species is overfished, depleted, a stock of concern, endangered, threatened, IUCN Near Threatened, US MMPA strategic species, and/or subject to overfishing and the fishery causes >1% of the species’ total mortality across all fisheries.

This would address issues of data availability and reduce the amount of time required of analysts to determine which species need to be included.

2. Inherent vulnerability, stock status, and fishing mortality are difficult to score for marine mammals, sea turtles, and seabirds due to data deficiency and resultant heavy reliance on IUCN ratings. The IUCN ratings are global in nature, and may not reflect the situation in individual regions adequately. The general tendency is to score too highly and subsequently face criticism from local experts.

We recommend that MBAq commission a consultant’s study or studies to result in:

- general inherent vulnerability scores for these species groups or individual species within these groups, and
- guidance on how to score data deficient fishery impacts on these species.

Comments on Factor 3

1. Regarding Factor 3.1: there are too many sub-factors, and scoring is burdensome for the analyst. We propose paring the number of sub-factors down to four from the existing seven by grouping some of them together: 1. strategy and recovery; 2. advice, track record, and enforcement; 3. research; and 4. stakeholder inclusion. We propose that the first three sub-factors should contribute 30% each of the factor score, with the fourth contributing 10%.
2. Regarding Factor 3.2: we don’t think it’s necessary to separately analyze whether or not

there is adherence to scientific advice with respect to bycatch. Specific scientific advice on bycatch reduction is often not published, and the analyst ends up considering whether or not the fishery is following conventional wisdom with respect to bycatch reduction. The spirit of this subfactor can be included in the Management strategy and implementation subfactor (is there a robust management plan in place, and is it being implemented?). We propose that this subfactor and the enforcement subfactor each contribute 40% of the factor score, with research and monitoring contributing the remaining 20% (many developing countries lack the budget to put into place systematic bycatch monitoring programs, but can still effectively reduce bycatch through management measures and associated enforcement).

3. For both Factor 3.1 and Factor 3.2, we recommend adding a fourth scoring category of “partially effective.”

Comment on Factor 4

1. Regarding mitigation of gear impacts: this subfactor is burdensome to score for most fisheries, as information regarding the percentage of habitat protected is often not readily available. We recommend that MBAq commission a consultant’s study to develop default scores for broad fishing areas such as Gulf of Mexico, USA, or Bering Sea, Alaska. Alternatively, MBAq staff could review existing reports and compile a table illustrating how various regions were scored. This table could be added to the method as an appendix and included in the “help” section within SWAT.

Comment on Salmon Standard

1. It may be onerous to score Factor 1.3 for the Pacific Northwest, a region of many hatcheries, distinct salmon populations, and relative data richness. We fear that the Factor in its current format is appropriate for an in-depth assessment such as that of MSC, but not for a desktop assessment such as that of MBAq.

Please let me know if you have any questions about these comments.

Best,



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Sustainable Fisheries Partnership