

July 29, 2015

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

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

Dear Dr. Pelc,

Sustainable Fisheries Partnership (SFP) thanks you for the opportunity to submit another round of written comments regarding the ongoing Seafood Watch Standards revision. The comments below regard three sub-topics: 1) improvement of the method (so that it reflects best available science, sets a reasonable sustainability “bar,” and is simple to apply for analysts), 2) benchmarking of the MBAq standard to other standards such as the Marine Stewardship Council, and 3) alignment of the MBAq SWAT and SFP FishSource databases.

Method Improvement

1. With respect to Criterion 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. They are also often out of date. The general tendency is to score too highly and subsequently face criticism from local experts. We recommend instructing analysts to not base Criterion 2 bycatch species status ratings upon IUCN ratings if they are over five years old. If the IUCN rating is more current but does not appear to be motivated by the region of assessment, the species should be handled as ‘data deficient’ rather than scored upon the basis of the IUCN rating.
2. Regarding mitigation of gear impacts (Factor 4.1b): this factor is burdensome to score for most fisheries, as information regarding the percentage of habitat protected is often not readily available. We recommend that MBAq 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.
3. Regarding Factor 1.2 (“Impact of Artificial Production”) of the salmon method: the data-poor method for assessing the possible negative impacts of artificial production is

straightforward and reasonable. However, the data-rich method has dual problems of: 1. being on the very leading edge of science with the thresholds that it incorporates, and 2. including statistics that may be impossible to gather for any salmon fishery at this time (i.e., pNOB). With respect to the second concern, unless a trial assessment is accomplished that succeeds in using the data-rich method in full, we recommend removing the data-rich matrix and applying the data-poor matrix to all fisheries.

Furthermore, we recommend that MBAq await finalization of this method before releasing new salmon fishery assessments. Mitigation of potentially negative hatchery impacts is an absolutely vital component of sustainable salmon fishery management. Scoring salmon fisheries without taking this component into account risks misrepresentation of fishery performance. We think that this concern is more serious than the problem of delaying updates to ratings while awaiting finalization of the method.

Benchmarking

4. Precautionary reference points for forage species have been incorporated into the “very low risk” benchmark for stock status, an important change to the method (Factor 1.2). Marine Stewardship Council has also recently made relevant updates to its standard and accompanying guidance and is instructing analysts to apply precautionary reference points for “key” low trophic species. It’s important for the sustainable seafood community to understand whether the two standards are treating this issue equivalently. Is MBAq applying precautionary reference points to all forage species, while MSC will only apply them to those low trophic species that meet criteria for “key?” Otherwise put, is MBAq’s bar for “very low risk” going beyond MSC’s “100” benchmark? We don’t think that benchmarks necessarily need to be aligned across standards, and we recognize that there are levels of performance that exceed MSC’s “100” benchmark, but we also think that it’s important to clearly communicate what the various standards represent.

SWAT-FS Alignment

5. We propose that MBAq and SFP adopt a common datasheet for storing time series of key statistical data for each fishery that is assessed by either organization. This measure would facilitate data sharing between the two organizations and has the potential to help the sustainability community to avoid duplicate effort in researching the status of fisheries, particularly if other organizations (MSC, RAM Legacy) were to adopt the datasheet as well.

Thank you again for inviting our participation in this process, and we look forward to continued collaboration.

Best,



Nicole Portley
Salmon and Shrimp Species Coordinator