

May 3, 2019

Santi Roberts
Science Manager, Monterey Bay Aquarium Seafood Watch
SFWstandardreview@mbay.org (sent via email)

Dear Mr. Santi Roberts:

Thank you for the opportunity to comment on the evolution of the Seafood Watch Fisheries Standard. We believe the Seafood Watch Standard plays a critical role in driving improvements in fisheries management by providing a well-recognized platform for fisheries to differentiate based on sustainability performance. We value the invitation to contribute to this mission.

We see an opportunity to improve the Standard with respect to the evaluation of fishery monitoring systems. Specifically, we believe that the use of emerging technologies such as electronic monitoring (EM) can be more clearly recognized within the Standard to support and incentivize continued improvements. Modernized fishery information systems that increase monitoring coverage, improve accountability and verifiability, and streamline data collection and analyses are crucial to responsive fisheries management and are at a critical juncture for expansion.¹ We believe that minor revisions to the Seafood Watch Standard would provide for greater differentiation of fleet performance based on fisheries monitoring coverage and quality. Such recognition via a globally recognized Standard can help lower the barriers to industry adoption of EM technologies and strategies, helping catalyze a new paradigm for transparency and accountability at sea.

Accordingly, we recommend the following revisions to Factor 3.3: Scientific Research and Monitoring:

1. Separate scientific research and monitoring into distinct factors. While stock assessment and analysis may incorporate monitoring outputs, the two topics speak to meaningfully different components in fisheries management.
 - a. Scientific research (e.g. bullets 1 and 2 in Table 3.3.1) is directly related to the evaluation of stock status, which is scored in Criterion 1. The overview of Criterion 1 provided on page 8 of the consultation document explicitly refers to the impacts of uncertainty in the stock assessment, demonstrating the thematic coherency between the stock assessment sufficiency and assessment of impacts on stock health. With this, we propose the most appropriate venue for the evaluation of sufficiency of this scientific research is within this same Criterion.
2. Revise the monitoring criteria (currently in Table 3.3.1) to assess the adequacy of at sea monitoring relative to its various roles:
 - a. Revise bullets 4 & 5 in the 'highly effective' category to speak more specifically to the numerous roles for at sea monitoring, not limited to catch accounting of both retained and discarded species; traceability and catch handling processes; compliance monitoring for

¹ For more information on the status of EM and prospects for growth, please refer to this 2018 report by California Environmental Associates (CEA) and The Nature Conservancy (TNC): <https://www.nature.org/emreport/>

legal disposal of gear and garbage; and compliance monitoring for measures related to discards and endangered, threatened, or protected species (ETP) interactions, and protected area compliance.

- b. These could be separated into multiple bullets and accompanied by one or more additional bullets regarding the sufficiency and timeliness of data analysis to inform management.
 - c. Include explicit recognition of the role of verifiable monitoring methods, such as EM, at all scoring levels, including the ‘moderately effective’ and ‘ineffective’ categories rather than just in the ‘highly effective’ category.
3. Expand upon the associated guidance to better recognize:
- a. Both coverage and verifiability are critical aspects of monitoring systems. Both EM and observer coverage provide a means for verification for otherwise self-reported data (e.g. logbook data).
 - b. The unique role that EM can play. For example, as noted in the aforementioned 2018 report by CEA and TNC², EM may be considered a preferred alternative to at-sea observers with regards to compliance monitoring as it can overcome challenges such as observer and deployment effects; limited pools of skilled observers; low observer coverage rates; bribery, intimidation, or “friendly” observer reports; and basic human limitations (e.g., need to eat, sleep). Additionally, EM can also be deployed to monitor labor practices and verify labor standards on board vessels.

Additionally, we recommend revising the definition for ‘reliable data’ in the glossary. We note that examples given in the current definition do not speak to on-the-water data. Under the current definition it is also unclear whether data collected under government-sanctioned exempted fishing permits (EFPs), such as those issued by NOAA Fisheries, would be considered as reliable. Data generated from on-the-water experimentation, such as those research activities conducted under EFPs, have been used by NOAA Fisheries for in season quota management and to modify or implement new sustainable fisheries management measures. Data collected under these specialized permits provide a critical, credible early knowledge base for innovations in sustainable fishing practices. We therefore recommend adding language that would allow for the consideration of “logbook and other data generated from government-sanctioned experimental or exempted fishing permits.”

Finally, we recommend that Seafood Watch further consider how it may more clearly recognize different certifications such as Marine Stewardship Council (MSC) to avoid confusing and inconsistent market signals. It may be appropriate to consider recognizing certain certifications such as MSC equivalent to a ‘Green’ rating.

Thank you again for the opportunity to participate in this important process.

Sincerely,



Kate Kauer
Fisheries Strategy Lead
The Nature Conservancy California

² *Id.*